

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

RECEIVED  
SDNY PRO SE OFFICE  
2022 APR -8 PM 3:05

CHIKEZIE OTTAH

Write the full name of each plaintiff.

\_\_\_\_ CV \_\_\_\_  
(Include case number if one has been assigned)

-against-

NATIONAL GRIP

**COMPLAINT**

Do you want a jury trial?  
☒ Yes ☐ No

Write the full name of each defendant. If you need more space, please write "see attached" in the space above and attach an additional sheet of paper with the full list of names. The names listed above must be identical to those contained in Section II.

22 CV 02935

**NOTICE**

The public can access electronic court files. For privacy and security reasons, papers filed with the court should therefore *not* contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include *only*: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number. See Federal Rule of Civil Procedure 5.2.

**I. BASIS FOR JURISDICTION**

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation, and the amount in controversy is more than \$75,000, is a diversity case. In a diversity case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal-court jurisdiction in your case?

☒ **Federal Question**

☐ **Diversity of Citizenship**

**A. If you checked Federal Question**

Which of your federal constitutional or federal statutory rights have been violated?

38 USC 271

A PATENT INFRINGEMENT

**B. If you checked Diversity of Citizenship****1. Citizenship of the parties**

Of what State is each party a citizen?

The plaintiff, CH, is a citizen of the State of  
(Plaintiff's name)

(State in which the person resides and intends to remain.)

or, if not lawfully admitted for permanent residence in the United States, a citizen or subject of the foreign state of

If more than one plaintiff is named in the complaint, attach additional pages providing information for each additional plaintiff.

If the defendant is an individual:

The defendant, \_\_\_\_\_, is a citizen of the State of  
(Defendant's name)

or, if not lawfully admitted for permanent residence in the United States, a citizen or  
subject of the foreign state of \_\_\_\_\_.

If the defendant is a corporation:

The defendant, National Corp, is incorporated under the laws of  
the State of \_\_\_\_\_

and has its principal place of business in the State of NEW YORK City

or is incorporated under the laws of (foreign state) UNITED STATES OF AMERICA

and has its principal place of business in \_\_\_\_\_.

If more than one defendant is named in the complaint, attach additional pages providing  
information for each additional defendant.

## II. PARTIES

### A. Plaintiff Information

Provide the following information for each plaintiff named in the complaint. Attach additional  
pages if needed.

<u>CHIKIZIE OZAIT</u>		
First Name	Middle Initial	Last Name
<u>648 DOROTHY LANE,</u>		
Street Address		
<u>Elmwood</u>	<u>NTS</u>	<u>11025</u>
County, City	State	Zip Code
<u>718 581 4539</u>		
Telephone Number	Email Address (if available)	

**B. Defendant Information**

To the best of your ability, provide addresses where each defendant may be served. If the correct information is not provided, it could delay or prevent service of the complaint on the defendant. Make sure that the defendants listed below are the same as those listed in the caption. Attach additional pages if needed.

Defendant 1:

First Name

Last Name

Current Job Title (or other identifying information)

Current Work Address (or other address where defendant may be served)

County, City

State

Zip Code

Defendant 2:

First Name

Last Name

Current Job Title (or other identifying information)

Current Work Address (or other address where defendant may be served)

County, City

State

Zip Code

Defendant 3:

First Name

Last Name

Current Job Title (or other identifying information)

Current Work Address (or other address where defendant may be served)

County, City

State

Zip Code





ATTACHED

**INJURIES:**

If you were injured as a result of these actions, describe your injuries and what medical treatment, if any, you required and received.

~~ATTACHED~~ ATTACHED

**IV. RELIEF**

State briefly what money damages or other relief you want the court to order.

ATTACHED

**V. PLAINTIFF'S CERTIFICATION AND WARNINGS**

By signing below, I certify to the best of my knowledge, information, and belief that: (1) the complaint is not being presented for an improper purpose (such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation); (2) the claims are supported by existing law or by a nonfrivolous argument to change existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Federal Rule of Civil Procedure 11.

I agree to notify the Clerk's Office in writing of any changes to my mailing address. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Each Plaintiff must sign and date the complaint. Attach additional pages if necessary. If seeking to proceed without prepayment of fees, each plaintiff must also submit an IFP application.

4/8/22  
 Dated  
CHKEZIE  
 First Name  
OTTAH  
 Middle Initial  
OTTAH  
 Last Name  
648 DONOTHEA LAURE, Elmore  
 Street Address  
N.Y.  
 County, City  
NEW YORK STATE  
 State  
11003  
 Zip Code  
718 581 4539  
 Telephone Number  
 Email Address (if available)

I have read the Pro Se (Nonprisoner) Consent to Receive Documents Electronically:

☐ Yes ☒ No

If you do consent to receive documents electronically, submit the completed form with your complaint. If you do not consent, please do not attach the form.

UNITED STATES DISTRICT COURT FOR THE

SOUTHERN DISTRICT OF NEW YORK

CHIKEZIE OTTAH

Case

Plaintiff

V

NATIONAL GRID

Defendant

*Officer*  
4/7/22

## PLAUSIBLE CLAIM OF TOOLS (TECHNOLOGY)

Claims are the bed rock of an invention

The claim of a patent determines the scope of the invention.

## BACKGROUND

With all due respect to the court, I have to state that the defendants have intentionally mean to miss lead the court, the case number 10 cv. 7287 the defendant miss represented the patent, especially the tool called resilient arm, and yet all of them are using it in their products. According to US patent 840, the resilient arm is a tool made to retract and extract to allow telescopic arrangements and modification, examples removal and attach from the axial joints, the arm adjustable like screwdriver is use to contract the clip through an adjustable clip body to lock the position of the book holder in a resilient lock and the arm again is used in anti clock turn to retract the positions of the book holder. See page 2, paragraph 6, of the summary of invention, Us patent 840. it state, It is another object of present invention to provide a clasp comprising a clip having an adjustable resilient arm for removably attached to a mounting structure on the mobile vehicle.

## UNDISPUTED ADJUSTABLE RESILIENT CLIP

This is relevant. Because the defendant has been making the product that function the same way US Patent 840 function with an adjustable resilient clip, with an adjustable bracket, base, screw, bolt, wire, screwdriver (bolt and or ridge grove hole) or cork grove and corkscrew, or and cable with copper conductor, semiconductors cable. This is a claim for patent infringement and a claim for relief that is plausible, Twombly (citing bell Atlantic Corp V. Twombly 550 US 544, 570, 127 S,ct.1950 167 L Ed2d 929 (2007) and Fed R,Civ.P.8

ANOTHER UNDISPUTED ADJUSTABLE RESILIENT CLIP: for the clear visibility of the court, a resilient clip means, is a tool that is combined by other tools, citing US Patent 840, claim 1, page 6, paragraph 2, line 1-4) (citing a dictionary definition of the platform book conjunction word, "ADAPT.....ABLE", see the claimed adaptable platform, claim 1, page 6, paragraph 1, line 3-4). This tools maybe combine with other tools to achieve an assembled manufactural result or function of book holder attachment and removal, including desired fixed to be removed by drill, fixed to be removed and attached with combination of screw spread and screwdriver, other trend include cork and corkscrew, wire, cable, cable and conductor, cable semi conduct ( citing the trend in specification, see Fig. 3, page 3, paragraph 1, line 3-5, ref. 12, Fig.1). Ref. Fig.1, a book holder support platform is adapted for separatable concentric interconnection. In Fig.1 a book support platform include writing board, drawing board, ELECTRONIC BOARD

ELECTRONIC BOARD COMPRISING: AUDIO/VIDEO AND EQUIPMENT, PDAS MOBILE PHONE, CAMERIA, COMPUTER, COMPUTERS,MUSICAL, TOYS, PUZZLES AND GAMES. (citing another trend in the specification, see Fig.4, page 2, paragraph 4, is side perspective view of a book holder of Fig.1, illustrating an alternative clip arrangement, see the content on Fig. 4, page 4, paragraph 1, line 1 – 14) the tooling assemble "can be selectively ( or adjustably) fixed by a screw"

#### CONSTRUCTION OF CLAIM

The court claims construction eliminated the claim section that represents the technology to the delight of the defendants. For example see id at1164 38, . As a Pro Se I believe in the laws of united of America. I trust the court to construct the claim fair and just but the court was miss lead to over look the definition and meaning of the Words that would have include technology into the scope of the claim.

#### THOSE REGULATIONS ARE ANTIDOTES

The point is the 1st court ignored the antidote ( CFR. 1.75, and CFR 1.58) in the specifications and draws and could not understand the meaning and definition at the claim.

Contrary Hon. Judge McMahon, in case number 10 Civ. 7296, see id at 1164 38, she believe that the claim section did not contain claim of technology and it result turned into De novo doctrine against 3 of my earlier case in SDNY. In her decision, Judge McMahon, I quoted the alternative with a reference to the interconnectors or electronic, but in the court decision, the court said the interconnector or the writing board was not in the claim, please see Fig. 3, page 3, paragraph 1, line 1 to 5. and see summary of the invention, page 2, paragraph 8, US Patent 840. And see the summary of invention page 2, paragraph 9, US Patent 840.

It took me three court ruling and two appeals to turn the unfavorable rulings, that force me into separately start my own claim construct and arrived at undisputed claim construct and we got the technology. Now the court has recognized and allowed me to add connector and interconnector in the claim elements and the scope include electronics and technologies. See Hon. Judge Lehrburger case number 19 Cv. 08289 PAE/RWL, caption Chikezie Ottah Nation Grid,

The applicant submits that the invention is not anticipate by the prior arts, further the use of adjustable, resilient clip arm on the clasp for clasping the book holder on a movable vehicle provide quick removal and attachment without tools, axial adjustment for adjusting the space between the clasp and the book support, rotational adjustment on the arm between the clasp and the book support, pivotal adjustments between the arm and the book support for is not obvious in the light of prior art. As described above, the resilient

clip has an arm, the arm is adjustable attached to it for contracting and retracting telescoping of the book holder. Example and relevant to the case, see the summary of invention US Patent number 840, page 2, paragraph 6,, it state, it is another object of the present invention to provide a clasp comprising a clip having an adjustable resilient arm for removably attached to a mounting structure on a mobile vehicle.

Now here is the relevant claim section, another modification, Claim 1, page 6, paragraph 3, line 5, Where in book holder is removably attached and adjusted to a reading position by telescopic arrangements axially adjusting the space relation between book support platform and clasp and the pivotal connection on the support platform pivotally adjusting the front surface with respect to the arm. This means that book holder can be removable and attached electronic or elements. In modification the word adjustable is powerful, for example it means change of elements, or rotational of the already fixed element or electronic, please see the attached dictionary mean, it is a fact plausible claim for a relief.

Here in the claim section above, the word ADJUSTABLE and A CONNECTOR in modification is straightforward, the connector or interconnectors provide the scope for both book and computer change, attached to the front platform, the connector or interconnectors provide the computer to adjustably remove the book and attach the computer, this is a fact and a plausible configuration, see Fig. 3, page 3, paragraph 1. Line 1 to 7, with reference to (12, Fig. 1).

See Fig.1 illustrated a book holder assembly 10 according to the 1st embodiment of present invention. The book holder 10 comprise a book platform 12 and an adjustable arm 14 and a 15 clasp. The book platform 12 includes a generally planar panel 16 ( 12 general planar panel, include computer, camera, radio, television, telephone, cellphone, video and audio) having a front 18 and a rear surface 20. The front surface 18 is configured to hold a book or suitable for use as a writing, drawing, white, black, electronic board, computer, laptop, camera, telephone, cellphone, phone, television audio video equipment. The rear surface of 20 book platform 12 is attach to the adjustable support arm 14 at an angle suitable for reading.



## INTERCONNECTOR OR CONNECTOR IS PLAUSIBLE ELECTRONIC OR TECHNOLOGIES.

Determining of patent infringement requires two steps , the 1st step is determining the meaning and scope of the patent claim to the asserted to be infringed , the 2nd step is comparing the properly constructed claim to the device accused of infringed. Marksman v. Westview instrument, inc. 52. F 3d 967, 976 (Fed. Cir. 1995).

An interconnector is a network system that allows you to become connected to a televised program through a wire, wireless telephone, television, computer, camera, audio video printer, or copier Services .

## THE ACCUSED PRODUCT

The accused product is a computer or book holder.

A platform, front surface telescopic arrangements computer slide into the 1 1 1 platform.

2. A brackets

3 resilient arm

4 upper arm

5. Resilient arm

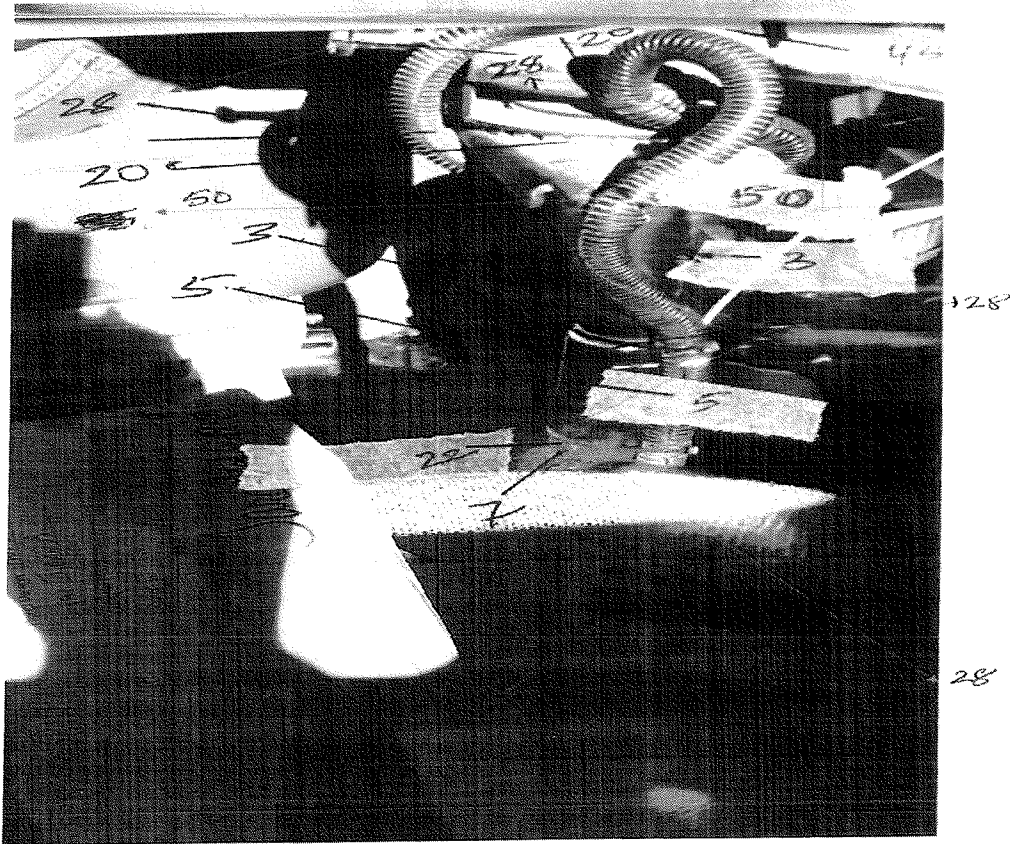
6 middle arm

7 Resilient arm

8 lower arm

9. Lower bracket

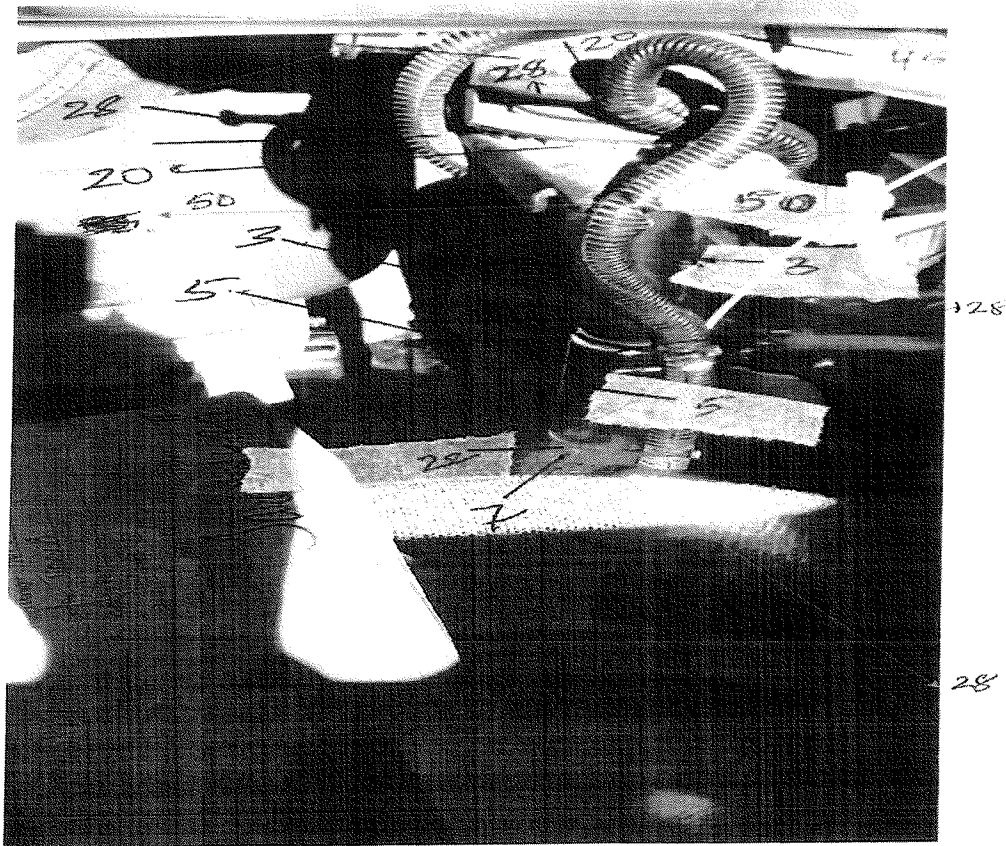
10 attach to the dash board



An adaptable tool that combines a screwdriver, a corkscrew, and a pillars.

To make this tools clearly ADJUSTABLE, and the defendant can take notice is to BREAK the tools down. (Ref. number 28 above Tools, simply called resilient clip/tools) see page

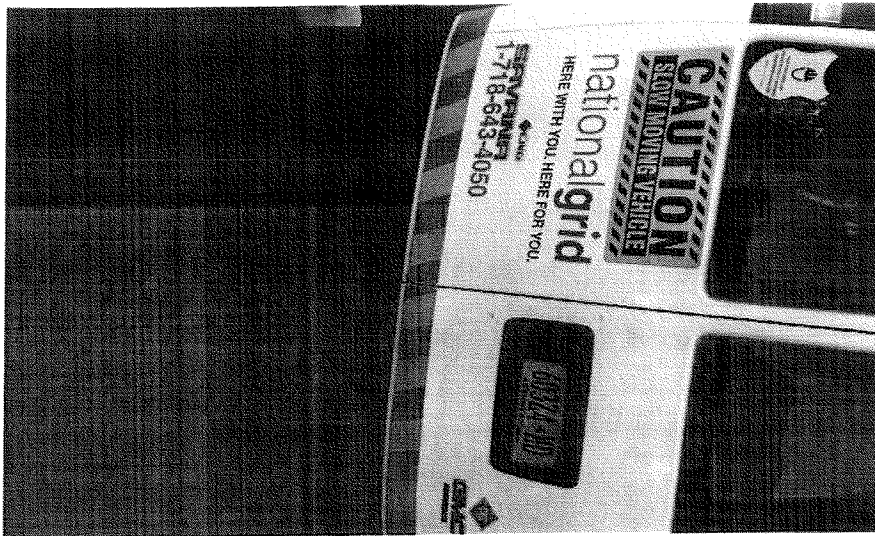
Clearly Resilient clip will comprise; a screw, a screw driver, a cork screw, a cork screwdriver, a cork grove, a grove screwdriver, base, nut, nut screwdriver, bolt, rivet, rivet screwdriver, USB port, flash clip, cable port, cable conductor clip, computer port. Others. It is undisputable an adjustable tools, the claim is therefore plausible and a claim for patent infringement.

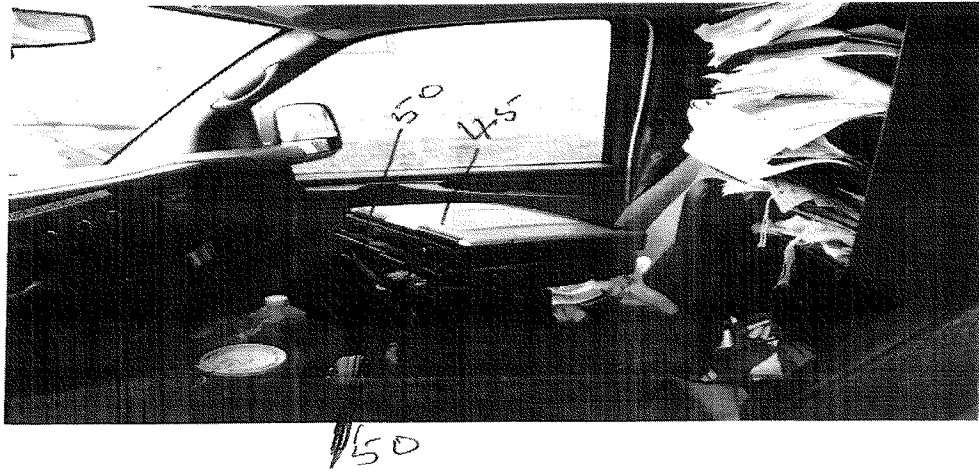


An adaptable tool that combines a screwdriver, a corkscrew, and a pillars.

To make this tools clearly ADJUSTABLE, and the defendant can take notice is to BREAK the tools down. (Ref. number 28 above Tools, simply called resilient clip/tools) citing VeriFone, 524 Fed. Appxat 630.

Clearly Resilient clip will comprise; a screw, a screw driver, a cork screw, a cork screwdriver, a cork grove, a grove screwdriver, base, nut, nut screwdriver, bolt, rivet, rivet screwdriver, USB port, flash clip, cable port, cable conductor clip, computer port. Others. It is undisputable an adjustable tools, the claim is therefore plausible and a claim for patent infringement.









Cambridge Dictionary

Meaning of **adjustable** in English

# adjustable

**adjective**

US  /ə'dʒʌs.tə.bəl/ UK  /ə'dʒʌs.tə.bəl/

+ ≡

**able to be changed to suit particular needs:**


- *The height of the steering wheel is adjustable.*
- *Is the strap on this helmet adjustable?*

— **SMART Vocabulary: related words and phrases**

Adapting and modifying

acclimate

acclimatization

≡ Contents To top 



Save

[more adaptable; most adaptable]

an *adaptable* tool that combines a  
screwdriver, a corkscrew, and pliers  
very *adaptable* animals

— often + to

- These plants are all easily *adaptable* to colder climates.
- The computer program is *adaptable* to the needs of individual users.

**[-] Hide examples**

10

## FOOT NOTE

ALL

SHOPPING

IMAGES

NEWS

VIDEOS

## Dictionary

Search for a word



**con·nect·or**

/kə'nektər/

*noun*

a thing which links two or more things together.

"a pipe connector"

- a device for keeping two parts of an electric circuit in contact.

- US

a short road or highway that connects two longer roads or highways.

Definitions from Oxford Languages

[Feedback](#)

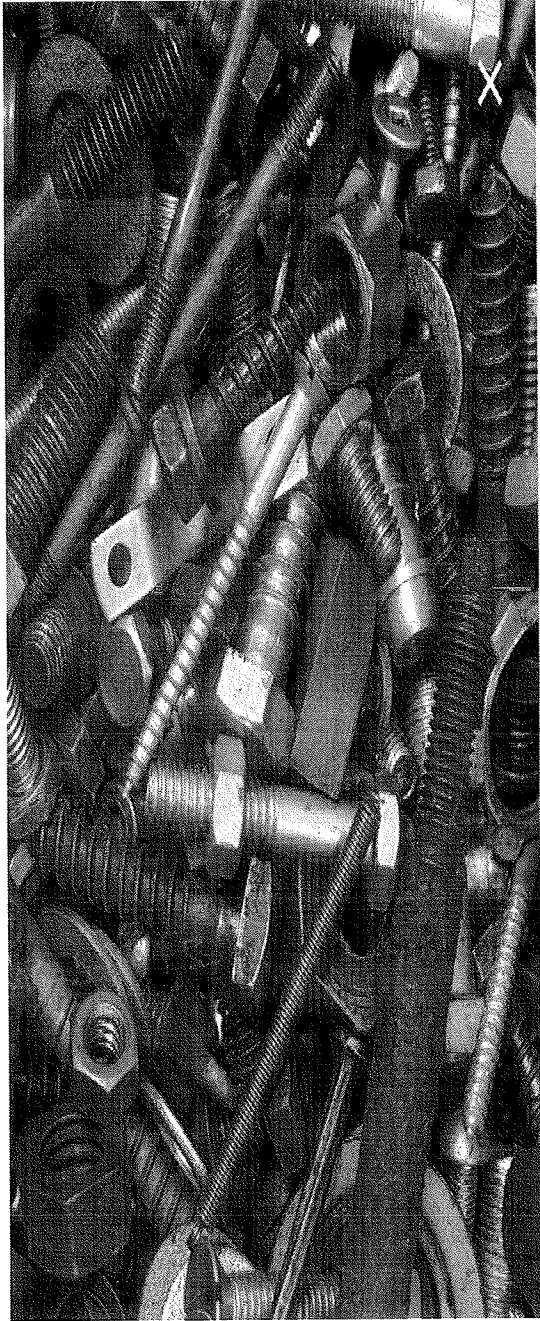
FOOT NOTE



Translations and more definitions



< > Back Forward Home Bookmarks Tabs

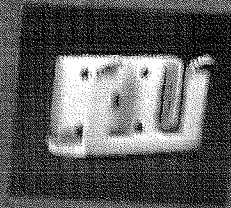
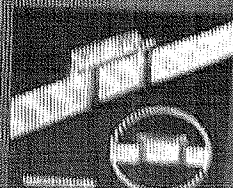
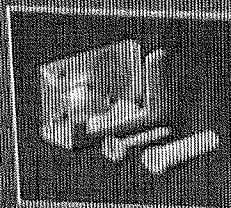
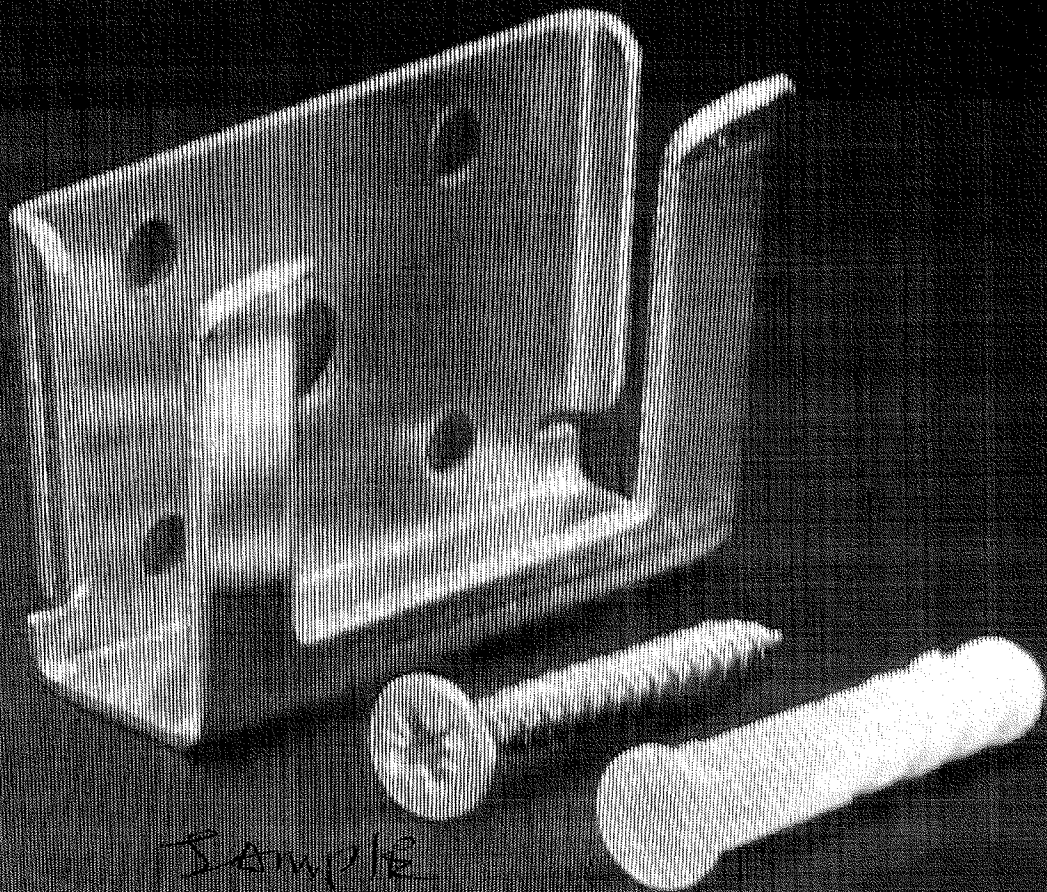


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Any of these tools can  
be combined with other tools  
see claim page 6, paragraph 2





  
Description

  
Specs

  
Applications

Metal Clip used for Emergency LED Strip Light



Forward

W



**United States District Court Of New York**

**Southern District Of NY NY 10007**

**Pearl Street Manhattan, NY NY**

**Chikezie Ottah**

**v.**

**National Grid**

**TABLE OF AUTHORITY**

**UNITED STATES CONSTITUTION**

**US PATENT 7,152,830**

**US PATENT SERIAL NUMBER 10/366/779**

**UNITED STATES DISTRICT COURT RECORD, NEW YORK**

**SOUTHERN NEW YORK**

**DICTIONARY ( foot notes)**



Number			
315	"book holder"	USPAT	19:56 2003/10/23
0	"book holder" and alphabet and child	USPAT	19:51 2003/10/23
12	"book holder" and child	USPAT	19:51 2003/10/23
129	"book holder" [ti]	USPAT	19:56 2003/10/23
0	"book holder" [ti] and audio X	USPAT	19:56 2003/10/23
6	"book holder" and audio X	USPAT	19:56

USPTO ~~SEARCHED~~  
SEARCH RECORD

THE PATENT MERIT BOTH BOOK  
AND TECHNOLOGIES  
PUBLISHED UNDER US Appl. # 10/366/779  
ADDITION TO US PATENT 7,152,840  
JULY 25 2005

NO RECORD OF A PRIOR  
ART ON AUDIO EQUIPMENT



UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

4 Avenue, No. 6, Trans Ekulu, GRA

Enugu, Enugu State, Nigeria

PLAINTIFF CHIKEZIE OTTAH

V. 19 CV 8552 (LGS)

Defendant NATIONAL GRID

Yaur Hon.

I respectfully state my name as chinyene Ottah  
I respectfully state my name as Kenneth Ottah  
we am co-owner of the US patent 7,152,840  
we respectful submit this affidavit as a fact  
that we have given Chikezie Ottah unilateral right to  
sue the accused product of the National Grid  
That we have with drawn our rights to sues the  
defendant in the same matter in the future. (RULE 20, and  
Rule 19 to prevent multiple law suit.)  
That we depose to this affidavit conscientiously and In good  
faith, believing in the laws of United States of America.



CHINYENE OTTAH



KENNETH OTTAH, AKA KENETH OTTAH




CHIKEZIE OTTAH

5/15/22

 4/7/22

LALI MELADZE  
NOTARY PUBLIC-STATE OF NEW YORK  
No. 01ME6195426  
Qualified in Kings County  
My Commission Expires 10-20-2024

  
04-08-2022.

UNITED STATES DISTRICT COURT FOR THE

SOUTHERN DISTRICT OF NEW YORK

CHIKEZIE OTTAH

Case

Plaintiff

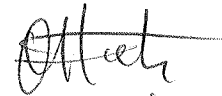
V

NATIONAL GRID

Defendant

**The patent US Patent 840 was granted on the day of Dec.26 2006, the patent merited 37 C F R 1.57, 37 C F R 1.75 (1), 35 USC 154(d), and 35 USC 252, and a claim technology.((incorporation by reference (12 Fig. 1, page 2, paragraph 1, line 1 to 10) and directly infringement of the claim.**

**Using the inter-conjunctive words to sort the meaning and definition of the claim, the claimed words and words in specification indicate that on the reference, the use of conjunction word (Adjustable) before resilient clip, The applicant submits that the invention is not anticipate by the prior arts, further the use of adjustable , resilient clip arm on the clasp for clasping the book holder on a movable vehicle provide quick removal and attachment without tools, axial adjustment for adjusting the space between the clasp and the book support, rotational adjustment on the arm**

  
4/7/22

between the clasp and the book support, pivotal adjustments between the arm and the book support for is not obvious in the light of prior art.

Show there is other tools or methods included, on the same day July 25, I stated to the examiner that a claimed audio video and equipment has been add to the specification, see US Appl.10/366,779, page 12/13, column 33/34. It is undisputed facts no prior art mention a cable or audio video equipment anywhere, it is obvious in the light of the prior art, the limitation of electronic tooling.

I learned, and respectfully state that the district courts ruling in the case number 10 cv. 7296 from USDC, and Appeal case number 12-1405 USCA Fed. Circuit was contradictory to the above mention laws.

The ruling from district USDC on the case 10 cv. 7296 estoppel, which relied on US Patent 4/201,013 by Wierma was contradictory to US 840 Patent scope that include tools, (soft and hard wares) technology and mobility.

The finding of estoppels and Appeals court in the case number 12-1405 construction of the scope of the claim without the claim section of audio equipment, which include audio video and equipment like planar panel, or TV, monitor, screen, computer, cell phone, Camera, blue tooth, out lets, writing board, black board, white board, ELECTRIC BOARD, soft ware and hardware like base, screw, screw driver, clip, resilient arm, clip arm,

clamps, bolt, brackets, or USB Cable, adapters, mouse, remote control, and Ethernet adapters or amplifiers, speakers, etc. was wrongful

I learned and respectfully state that the ruling from the lower courts like case number 1.15 cv.02465 LTS, and 11-cv. 06187 contradict US 840 in technology and tools also citing or relying on US patent 4/201,013 was wrongful. The court claim construction eliminates claim section for technology, please see claim section, Page 6, paragraph 3, line 1 to the end, the claimed connector/interconnection is claim of the technology and it have change the scope of the book holder.

#### **THE MEANING OF CONNECTOR AND OR INTERCONNECTOR**

“An interconnector is a network system that allows you to become connected to a televised program through a wire, wireless telephone, television, computer, camera, audio video printer, or copier Services”

This has stated a plausible claim

On Chikezie Ottah V. National Grid, 19 Civ. 08289 (PAE)(RWL) I respectfully thank the court for acting on claim construction I submitted, the court finally recognized the technology and it claimed elements in the claim, example the connector or and interconnector, it is a sophisticated language to claim huge amount of electronics, there soft ware and hardware in a simply one name. I respectfully state that the electronic or technology and other items were writing all over the specification, please see Fig. 1, paragraph 1, page 2, line 5 to 8, US Patent 840, another example



where technology and electronic was individual mention was on Fig. 8, paragraph 3, page 5, line 2 to 4 US Patent 840, anothers.

I respectfully thank the court for understanding that those electronics, or technologies, and the items are collectively interconnectors or connectors, the book holder is built on the demand of the user, example an interconnector or connector have a laptop or camera, the soft ware and hard ware ( example electric cable or screws) to mount the camera on a mobile vehicle, please see the summary of invention, page 2, paragraph 6, 7, 8, 9. They are relevant to this case. I regret the court passed a good opportunity for a guilty verdict against National Grid, my claim construction was good enough for a guilt verdict, because the claim was plausible.

Chikezie Ottah V. Verizon, case number 19 Civ. 8552 (LT) I respectfully thank the court for acting on claim construction I submitted, the court finally recognized the technology and it claimed elements in the claim, example the connector or and interconnector, it is a sophisticated language to claim huge amount of electronics and there soft ware and hardware in a simply one name, example an interconnector or connector ( Plausible) have a laptop or camera, the soft ware and hard ware ( example electric cable or screws) to mount the camera on a mobile vehicle with book holder, removably attach, please see the summary of invention, page

2, paragraph 6, 7, 8, 9. They are relevant to this case. I regret the court passed a good opportunity for a guilty verdict against Verizon, my claim construction and summary Judgment was good enough for a guilt verdict, because the claim was plausible.

### **PLAUSIBLE CLAIM OF THE WORD INTERCONNECTOR (CONNECTOR).**

This is what the above court knew in the definition and meaning of the word interconnector from dictionary:

two or more things

[+] Example sentences

**2 [noncount] : the act of connecting two or more things or the state of being connected**

[+] Example sentences

**3 [count]**

**a : a situation in which two or more things have the same cause, origin, goal, etc.**

[+] Example sentences

**b : a situation in which one thing causes another**

[+] Example sentences

**4 [count]**

**a : something that allows you to become connected to a system, network, etc., through a telephone, computer, or other device**

[+] Example sentences

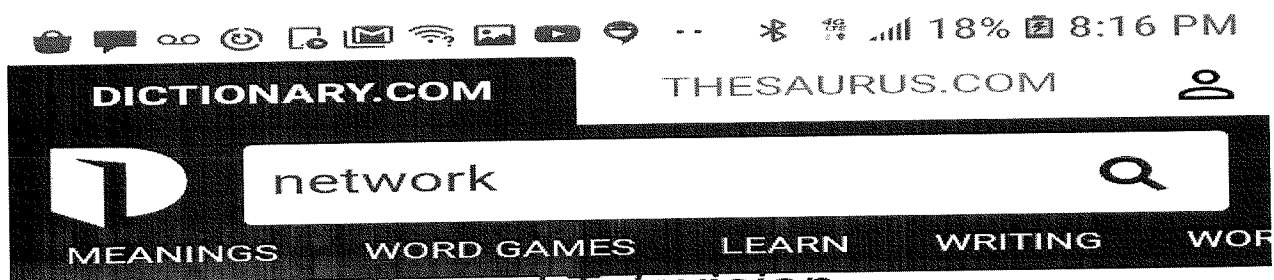


Ad

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Foot Note



2 *Radio and Television.*

- a a group of transmitting stations linked by wire or microwave relay so that the same program can be broadcast or telecast by all.
- b a company or organization that provides programs to be broadcast over these stations:

*She was hired by the network as program coordinator.*

3 *Telecommunications, Computers.*

a system containing any combination of computers, computer terminals, printers, audio or visual devices, or telephones interconnected by

**The Only  
Gift  
Parents  
Need Is  
Here**

The court knew the claimed interconnector or connector word when sort out meanings computer, audio or visual, telephone, camera, printer, E book and other devices. Just like mention in the specification, for example see US Patent 840, Fig. 8, page 5, paragraph 3.

Further from the mention in the specification on Fig. 8, page 5, paragraph 3, where the electronic elements and equipment are not functional, but

FOOT NOTE

inside the claim, the technology mention above are network bound and functional, modifiable or adjustably removably attached to mounted on a book holder, telescopic arrangement axially adjusting to reading position, adjusting the space relation between the book support platform and the bracket, that is plausible.

#### **ESTOPPLE:**

It is other object of the present invention to provide a clasp comprising a clip having an ADJUSTABLE resilient arm for removably attaching to a mounting structure on the mobile vehicle. This is relevant to the stopple case, to the honorable Judge, and to the post case 11 cv. 06187.

Case number 1.15 cv.02465 LTS, and 11-cv. 06187

Please Honorable, this cases was found not infringed due to the defendants misguided interpretation of estoppel, Your honor here is the tool at the center of the misinterpretation RESILIENT CLIP ARM, and here is the meaning: “An adaptable tool that combines a screwdriver, a corkscrew and a pillar” please see the conjunction word “Adjustable” above, see the claim, Page 6, paragraph 2,” A clasp comprising, a clip head, a clip body, and a pair of resilient clip arm, the clip arm adjustable mount on the clip head and clip head attached on the clip body” this is an

adaptable tool that combine with other tools. Undisputable limitation for the prior art, and a direct a claim for relief that is plausible.

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**Learner's Dictionary**

≡ adaptable × 🔍

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**adaptable** 🔊 Save  
 /əˈdæptəbəl/ ☆  
*adjective*

[more adaptable; most adaptable]

: able to change or be changed in order to fit or work better in some situation or for some purpose : able to adapt or be adapted

- an *adaptable* tool that combines a screwdriver, a corkscrew, and pliers
- very *adaptable* animals

[-] Hide examples

— often + *to*

- These plants are all easily *adaptable to* colder climates.
- The computer program is *adaptable to* the needs of individual users.

[-] Hide examples

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FOOT NOTE, LEARNERS DICTIONARY

Cambridge Dictionary

Meaning of **adjustable** in English

**adjustable**

*adjective*

US /ə'dʒʌs.tə.bəl/ UK /ə'dʒʌs.tə.bəl/

+ ≡

**able to be changed to suit particular needs:**

- *The height of the steering wheel is adjustable.*
- *Is the strap on this helmet adjustable?*

— **SMART Vocabulary: related words and phrases**

Adapting and modifying

acclimate

acclimatization

≡ Contents To top

No prior art made of record have same configuration mention inside the claim or in the specification of US 840, the defendant is welcome to present the prior art that form the base for estoppel.

FOOT NOTE; CAMBRIDGE DICTIONARY

instead of the 3 elements know to the courts when the 1<sup>st</sup> claim construction was made, the elements are 5 now.

I learned and respectfully state that the ruling of the lower courts on standard review or De novo standard relying on incomplete claim construction is unfair and unjust, I believe that the court (Supreme court) do not leave unfair, unjust, and unlawful art, or otherwise the best persuasive argument that ham the people to under mind the justice and the rule of law. I believe the court or the Judges have the power and the knowledge to deliver Justice.

FRCP 15(d) this is a fact, where justice is concern the court have overruled its prior decisions, like the Supreme court in Tevo Pharm. USA V. Sandoz inc. the ruling on claim scope is a matter of claim construction which is a question of law. See United States Court of Appeals, case number 17/2369.

FOREST LABS. LLC V. SIGMAPHARM, ,17.2369

*Federal Circuit Summary*

Before Prost, Dyk, and Moore. Appeal from District of Delaware.

Your Hon. I respectfully submit my claims for Patent US 840. The same is attached in the compliant.

THE CONJUNCTIVE WORD "AJUSTABLE".

The actual language during the prosecution, the defendant added during the prosecution I argued that "the use of Adjustable resilient clip on the clasp for clasping the book holder to the movable vehicle providing quick removal and attachment without tools..... is not obvious in the light of the prior art" the word adjustable resilient clip introduce facts about the resilient clip is not only used in one way, but multiple ways, a resilient clip comprising a screw, a screw

driver, cork screw, cork screw driver. Base, brackets, ridge groove, ridge groove screw and or screw driver, cork USB, USB cork port or ports, cable with copper tips ( Concentric interconnector Fig,3 page 3, paragraph 1, line 6 US Patent 840)

Your Hon. During the same prosecution, I also informed the examiner that the previously claimed technologies and equipment, like a cable have be added to the specification, ( see Fig. 8, page 5, paragraph 3 US Patent 840)( see the publication US 10/366/779 , publication date 2/19/2003) ( see Ottah V. Flat Chrysler, 884 F. 3d 1135, United States court of Appeals, Federal Circuit. Id.at col.6, 11.14-38, and Id.at col.5, 11.35-40).

#### AFTER THE FACTS:

Your Hon. It is a fact the prior art do not assemble electrical cable, or a concentric connection or "adaptable" interconnection of any type. It is obvious in the light of the prior art. Without any explanations quick removal and attachment without tools..... is not obvious in the light of the prior art" the word adjustable resilient clip introduce facts about the resilient, the defendant effort to restrict the use of tools for US Patent 840 is after the fact, the adjustability function of US Patent 840 allow the assembling of the fixed with drill, or tools that allow combination of other tools.

#### CLAIMED ELEMENTS OF US 840;

1. A book support platform, the book support platform comprising a front surface, a rear surface and a plurality of clamps, the front surface adapted for supporting a book, the plurality of clamps disposed on the front surface to engage and retain the book to the book support platform, the rear surface separated from the front surface:
2. A clasp comprising a clip head, a clip body, a pair of resilient arms, the clip arms adjustably mounted on the clip head and attach to the clip body, and
- 3. An arm comprising a first end and a second end and a telescoping arrangement, the clasp on the first end, the second end pivotally attached to the book support platform, the telescoping arrangement interconnecting the first end tob the second end, the clasp space from the**



book support platform, wherein the book holder is removably attached and adjusted to a reading position by the telescoping arrangement axially adjusting the space relation between the book support platform and the clasp and the pivotal connection on the book support platform pivotally adjusting the front surface with respect to the arm.

4. Audio equipment, include planar panel, TV, monitor, camera, computer, lap top, cell phone, hard ware and soft ware, audio video.
5. book, E-book, blue tooth, and hard ware and soft ware

The last 2 elements was incorporated (37 C F R 1.57) from an original claims disclosed on 2/19/2003 page 2, also disclosed again on 4/24/2004, page 13, the publication was in US Patent application number 10/366/779. See the attached appendix pages 22 and 32. 35 USC 154 (d). See US 840 page 6, paragraph 1, line 1 to 11.

### 3<sup>rd</sup> ELEMENT: THE ARM IS OPTIONAL

Your Hon. I respectfully incorporate this claims to be legally granted by law, please see the attached memorandum pages 10 to 16. Honorable learned Justice, please see Patent US 840, Fig.8, Page 5, paragraph 3. See Fig.1, page 2, line 5 to 8, the specification have the technologies, it is identical with the claim. Good thing is the technologies can be assembled in their own tools. See the incorporated claim 4, 4. Audio equipment,

include planar panel, TV, monitor, CAMERA, computer, lap top, cell phone, hard ware and soft ware, audio video equipment.

The tools or equipment may need a minor modification of tools or hard ware or soft ware (soft ware are tools) to assemble the camera (Camera, monitor, screen, planar panel) in a GM cars from Toyota, ford, etc. Your Hon. see page 6, paragraph 1, US 840 suggested converting or assembling parts into a functioning unity, see the specification on Fig. 1, paragraph 1, line 6 to 8, it state that the platform may be “configure” to be suitable for book, writing board, white board, drawing board and ELECTRONIC BOARD. See the claim section, US 840 page 6, in element 1, line 3, the front surface “adapted” for support book, or herein camera. Your Hon. the law, the specification and the claim are identical in making, modifying, and assembling the named items or camera, see Fig. 8, paragraph 3, Your Hon. it is substantially the same in a appeals court review with the defendant vehicle camera.

This is the claim as exactly or origination written, Date 2/19/2003, and publication number is 10/366/799. A second publication dated on 4/24/2003. I Chineye Ottah and Kon Woryz Corporation are claiming priority with noon-start as a head start product and a book holder targeted to structures use mostly by children.

“Noon-start is the first head start product on children strollers, carriage, bed, chairs, and on the floor that help mold the kids reading, writing, singing, and playing habits.

The product give the kids advantages in learning because noon- start can be use by kids in any environment, at the bus stop. Train, at the park, at the beach, restaurant, at school, and at hoom. Reading writing, singing, and playing with book and or AUDIO EQUIPMENTS.

Noon-start is a book holder” the mobile AUDIO EQUIPMENTS is plausible claim of defendants liability, the earlier ruling of non infringement in case number 1.15 cv.02465. LTS should be over turn. I plead Your Hon.

Reinstate the following cases from USDC for the same infringement case number 11-cv.06187, and 10 cv.7296CM

#### PLAUSIBLE CLAIM OF TECHNOLOGY:

Claims are the bed rock of an invention

The claim of a patent determines the scope of the invention.

#### BACKGROUND

With all due respect to the court, I have to state that the defendants have intentionally mean to miss lead the court, the case number 10 cv. 7287 the defendant miss represented the patent, especially the tool called resilient arm, and yet all Of the defendant are using it in their products. According to US patent 840, the resilient clip is a tool made to retract and extract to allow telescopic arrangements and modification, examples removal and attach from the axial joints, the arm adjustable like screwdriver is use to contract the clip through an adjustable clasp or clip body a base to lock the position of the book holder in a resilient fixed and the arm again is used in anti clock turn to retract the positions

of the book holder. See page 2, paragraph 6, of the summary of invention, Us patent. it state, It is another object of present invention to provide a clasp comprising a clip having an adjustable resilient arm for removably attached to a mounting structure on the mobile vehicle. This is relevant.

#### CONSTRUCTION OF CLAIM

The court claims construction eliminated the claim section that represents the technology to the delight of the defendants. For example see id at1164 38, . As a Pro Se I believe in the laws of United of America. I trust the court to construct the claim fair and just but the court was miss lead to overlook the definition and meaning of the Words that would have include technology and tools into the scope of the claim. See claim section, Page 6, paragraph 3, line 1-9, connector/interconnector.

#### THOSE REGULATIONS ARE ANTIDOTES

The point is the 1st court ignored the antidote ( CFR. 1.75, and CFR 1.58) in the specifications and draws and could not understand the meaning and definition of the same word interconnector or and connector at the claim.

Contrary Hon. Judge McMahon, in case number 10 Civ. 7296, see id at1164 38, she believe that the claim section did not contain claim of technology and it result turned into De novo doctrine against 3 of my earlier case in SDNY. In her decision, Judge McMahon, I quoted the alternative with a reference to the interconnectors or electronic , but in the court decision, the court said the interconnector or the electronic board was not in the claim, please see Fig. 3, page 3, paragraph 1, line 1 to 5. and see summary of the invention, page 2, paragraph 8, US Patent 840. And see the summary of invention page 2, paragraph 9, US Patent 840. The electronic was reference interconnectors ,or connectors.

It took me three court ruling and two appeals to turn the unfavorable rulings, that force me into separately start my own claim construct and arrived at undisputed claim construct and we got the technology. Now the court has recognized and allowed me to add connector and interconnector in the claim elements and the scope include electronics and technologies. See Hon. Judge Lehrburger case number 19 Cv. 08289 PAE/RWL, caption Chikezie Ottah Nation Grid,

The applicant submits that the invention is not anticipate by the prior arts, further the use of adjustable , resilient clip arm on the clasp for clasping the book holder on a movable vehicle provide quick removal and attachment without tools, axial adjustment for adjusting the space between the clasp and the book support, rotational adjustment on the arm between the clasp and the book support, pivotal adjustments between the arm and the book support for is not obvious in the light of prior art.

As described above, the resilient

clip has an arm, the arm is adjustable attached to it for contracting and retracting telescoping of the book holder. Example and relevant to the case, see the summary of invention US Patent number 840, page 2, paragraph 6,, it state, it is another object of the present invention to provide a clasp comprising a clip having an adjustable resilient arm for removably attached to a mounting structure on a mobile vehicle.

Now here is the relevant claim section, another modification, Claim 1, page 6, paragraph 3, line 5, Where in book holder is removably attached and adjusted to a reading position by telescopic arrangements axially adjusting the space relation between book support platform and clasp and the pivotal connection on the support platform pivotally adjusting the front surface with respect to the arm. This means that book holder can be removable and attached electronic or elements. In modification the word adjustable is powerful, for example it means change of elements, or rotational of the already fixed element or electronic, please see the attached dictionary mean, it is a fact plausible claim for a relief.

Here in the claim section above, the word ADJUSTABLE and A CONNECTOR in modification is straightforward, the connector or interconnectors provide the scope for both book and computer changes, attached to the front platform, the connector or interconnectors provide the computer to adjustably remove the book and attach the computer, this is a fact and a plausible configuration, see Fig. 3, page 3, paragraph 1. Line 1 to 7, with reference to (12, Fig. 1).

See Fig.1 illustrated a book holder assembly 10 according to the 1st embodiment of present invention. The book holder 10 comprise a book platform 12 and an adjustable arm 14 and a 15 clasp. The book platform 12 includes a generally planar panel 16 ( 12 general planar panel, include computer, camera, radio, television, telephone, cellphone, video and audio) having a front 18 and a rear surface 20. The front surface 18 is configured to hold a book or suitable for use as a writing, drawing, white, black, electronic board, computer, laptop, camera, telephone, cellphone, phone, television audio video equipment. The rear surface of 20 book platform 12 is attach to the adjustable support arm 14 at an angle suitable for reading. See the meaning of the adaptable, connector or interconnector above, the meaning of those words read the same meaning in the specification.

The specification describes the claimed book holder and its removable and attachment, relevant to this suit, the specification ended, just below to the claim, state that the book holder may be used to hold this items other than the books: the platform 12 may also be used to support such items as audio video and equipment, PDAs, Mobile phone, camera, computers, musical instruments, toys, puzzle, games, the panel 16 may be provided with a set of mounting positions for receiving and or mounting the above items.

INTERCONNECTOR OR CONNECTOR IS PLAUSIBLE ELECTRONIC OR TECHNOLOGIES.

Determining of patent infringement requires two steps, the 1st step is determining the meaning and scope of the patent claim to the asserted to be infringed, the 2nd step is comparing the properly constructed claim to the device

accused of infringed. Marksman v. Westview instructment, inc 52. F 3d 967, 976 (Fed. Cir. 1995).

‘An interconnector is a network system that allows you to become connected to a televised program through a wire, wireless telephone, television, computer, camera, audio video printer, or copier Services .’

## THE ACCUSED PRODUCT

The accused product is a computer or book holder.

A platform, front surface telescopic arrangements, a computer slide into the platform

1 platform.

2. A brackets

3 resilient arm

4 upper arm

5. Resilient arm

6 middle arm

7 Resilient arm

8 lower arm

9. Lower bracket

10 attach to the dash board

THE CLAIM; UNDISPUTED BY THE DEFENDANT  
THE CLAIM IS THE BED-ROCK OF PATENT, WITH CLARITY.

**Platform**

1. Platform front surface maybe adopted, or modified, configured to hold books or technology (Eg. White board, black board, ELECTRONIC BOARD)

Platform maybe clamped, locked, or use other tools, connector, bracket,

2. clasp, ( maybe modified) to base, connectors. Or brackets

Clip head – maybe modified, holes, bolt, screw, clip, Base, to hold another element

1<sup>st</sup> and 2<sup>nd</sup> arm (maybe modified) to mount vertical or horizontal

Clip - maybe clip body to attach, element to attach to another

clip arm - clamping brackets, slidable connectors and others

Clip arm – element that require tools to attach/ hold to another elements to mount - multi- sides I shape brackets or connector, or base

3. Arms (no dispute) stable pole (example elongated arm) attach to the vehicle floor and holding the platform in a readable positions. Adaptable to elements.

Interconnector; soft ware or hardware, like audio video equipment, amplifier, mouse, swivel, input or output devices and there hard shell, mother board, CPU, memory, processor, power and power line cable, fan, IP, LAN, computer, camera, phone, printer

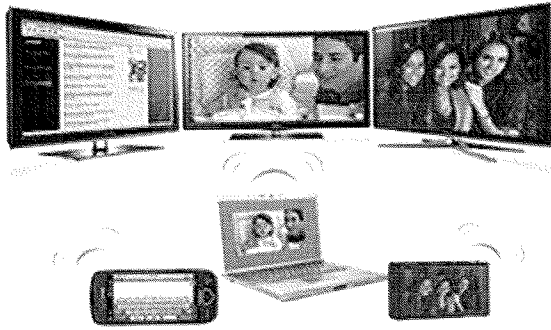
Pivot attachment - inter-connector eg software or hardware, like audio video, or tile, V,L,O, C, Z connectors, screws, rivet, swivel, multi. Side bracket, single or multi. Hole brakets etc.

Pivotal attachment to the platform - interconnector, eg. audio video equipment Software and or hardware, like LAPTOP, screw, connectors, brackets, nuts, bolts, rivet, base, power cables, mause, USB cords, IP address etc.

Pair of resilient - concentric mount equipment, nut, rivet, bolt, etc

Pivotal adjustment - the interconnector are software and or hardware that allow movement





## **CONNECTOR AND INTERCONNECTOR**

**INTERCONNECTOR OR CONNECTOR IS PLAUSIBLE ELECTRONIC OR TECHNOLOGIES.**

Determining of patent infringement requires two steps, the 1st step is determining the meaning and scope of the patent claim to the asserted to be infringed, the 2nd step is comparing the properly constructed claim to the device accused of infringed. *Marksman v. Westview instrument, inc.* 52. F 3d 967, 976 (Fed. Cir. 1995).

‘An interconnector is a network system that allows you to become connected to a televised program through a wired, wireless telephone, television, computer, camera, audio video printer, or copier Services.’

## **THE LAPTOP HOLDER CONSTRUCTION OF ELEMENT**

**ATTACHED IS THE ACCUSED BOOK/LAPTOP HOLDER PARTS FOUND IN VERIZON VEHICLE.**

- 1. (20) PLATFORM (DESIGNED FOR LAPTOP)**
- 2. (22) CLIP/clip body**

3. (28) ADJUSTABLE ARM
4. (03)UPPER ARM
5. (05) lower arm
6. (08) Clip arm
7. (7) base
8. (22) 22 screw hold
9. (45) lop top
- 10.(50) wire

This elements are consistent with elements in US Patent 7,152,840. See exhibit 1.

ATTACH IS A SLIGHTLY ADAPTABLE OR MODIFIED BOOK /LAPTOP FOUND IN DEFENDANT VEHICLES.

1. THIS IS ELEMENTS AND EQUIVALENTS AS FOUND IN US PATENT 7,152,840
2. 3. Upper Arm. 5. lower arm
3. 7 Base
4. 20 Platform
5. 22 Clip /Clip body
6. 28 Adjustable handle /arm /lock
7. 41 Pivotal connector ( if applicable 45. Lab top. 50 mobile lab top equipment)
8. THIS IS ELEMENTS AND EQUIVALENTS AS FOUND IN VERIZON PRODUCT
9. 3. Upper arm. 5. lower An arm
10. 7 Base
11. 20 Platform
12. 28 Adjustable handle/lock / resilient arm
- 7
- 13.22 Clip /Clip body
- 14.28 Adjustable handle /arm /lock
- 41 Pivotal connectors

## **BRIEF DESCRIPTION OF THE DRAWING**

A description of the infringement illustrated using words from Fig.4.

Fig. 4. See the publication in US Patent Appl. Number 10/366,779, date July 25 2005, page 33 to 38, paragraph 2.

[0020] Fig. 4. Is a side perspective view of the book holder of Fig. 1 illustrating an alternate clip arrangement; this are the claimed embodiment in Fig.4

Illustrating a 20 book or 45 audio video equipment support, and support 3 arm. The support arm comprise a 7 base, a lower section 5 and upper section 3, the lower 5 arm comprise of 7 and 22 holes is removable by 7 screw means; 7 screw thread 7 base to a vertical or horizontal object(a pole) on the mobile vehicle/ the 5 arm 28 connector rotatable or slidably attach to the lower of the 5 supporting arm to the upper 3 section. The upper 3 arm section has pivotal 41 connectors or 50 inter connectors. The base was modified from the shown clip body in Fig. 5, please see the exhibit 1 and 2, and the claim for the definition of a clip body,

## **Legal**

The design product from US patent 7,152,840, is identical to defendant product seen in exhibit 1, all the, design, elements or equivalent are the same.

The design product from US Patent 7,152,840 and defendant product seen in exhibit 2, all the elements or equivalent are the same, and function the same way, production the same, the description above said it all. The plead is justified according to Fed.Civ.P. 8(a)(2) it is a fact any jury will convent the defendant.

The defendant products in exhibit 1 and exhibit 2 already exist, see US Patent 7,152, 840. Even if US Patent 629 is presented for the defendant protection, US Patent 629 is late and not effective.

°This is what the Hon. Judge meant during

the court review and construction of 840 claim citing Verifone, 524 F. Appx. at 629 based on claim 1, required that "the book holder is removably attached, the defendant added during the prosecution I argued that "the use of Adjustable resilient clip on the clasp for clamping the book holder to the movable vehicle providing quick removal and attachment without tools..... is not obvious in the light of the prior art"

THE DEFENDANT MISLEADS THE COURT ON TOOLING AND CLIP (Alternative Clip is screw or screw driver see, Fig. 4, paragraph 1, page 4, line 12-14)

Please see, Brief description of 840 Patent Drawing, Fig. 4, Page 2, paragraph 4, it States: Alternative clip or tool arrangement. Your Hon. Clip is simply tools, example a resilient clip means a resilient tool, please see the explanation below. The defendant is being restrictive.

FIGURE 4, PAGE 2, PARAGRAPH 4, 37 CFR 1.75

It referenced and incorporated Fig. 1, (12), 37 CFR 1.57. Incorporate by reference the configuration of 12 book platform, example of the book platform are writing, drawing board, white board, black board, ELECTRONIC BOARD.

ELECTRONIC BOARD, Comprises; audiovisual, Computer, laptop, Camera, Radio, Fax, printer, Cellphone, phone.

Although the invention has been described above in connection with particular embodiment and examples, it will be appreciated by those skilled in the art that the invention is not necessarily so limited and that numerous other embodiments, example and uses are intended to be encompassed by the claims attached hereto.

#### TECHNOLOGY CONTEXT IN US PATENT 840

The specification describes the claimed book holder and its removable attachment. Relevant to this suit, the specification concludes with the statement that the book holder may be used to hold items other than books "the book platform 12 may also be used to support such items as audio video equipment, PASSENGER, or mobile phones, Camera, computers, musical instruments, toys, puzzles and games. The panel 16 may be provided with a set of mounting positions for receiving and /or mounting the above item( not shown Id. at col, 5,11, . 35 40,) and see Fig.8, page 5, paragraph 3,

More content relevant to the suit, see the summary of the invention, page 2, paragraph 6, it states it is the object of the invention to provide a writing board, example white board, black board, ELECTRONIC BOARD comprising an audio video, mobile phone, camera, computer, laptop, Fax, copier, bar code, media exchange, internet and equipment's.



Further context, see Fig. 3, page 3, paragraph 1. It referenced and incorporated into Fig. 1, (12), 37 CFR 1.57. Incorporate by reference the configuration of 12 book platform, example of adaptable book platform are writing, drawing board, white board, black board, ELECTRONIC BOARD.

ELECTRONIC BOARD, Comprises; audiovisual, Computer, laptop, Camera, Radio, Fax, printer, Cellphone, phone.

IT IS PLAUSIBLE THE CLAIM OF THE TECHNOLOGY. While the ordinary meaning of claim language as understood by a person of skill in the art may readily apparent even to a lay Judge, claim construction in such cases involves little more than the application of widely accepted meaning of the commonly understood words. The uses of technology have been well documented

see the claim section, page 6, paragraph 1

and an adjustable arm 14 and 15 a clasp

#### ADJUSTABLE

Arm (IF NECESSARY ADD OR REDUCE ARM)

And clasp (ALL THE ABOVE TOOLS AND ELEMENTS)

Please see, Fig. 8, page 5, paragraph 3, line 1-6.

Your Hon. See the bottom text on Fig. 4, paragraph 1, page 4, line 12-14. It states that the position of the clip arms 74a74 along the clip body 78 can be selectively fixed by a screw. Example a base may be embed by a screw, and the joint between two arms is joined by resilient clip, to allow positioning of the book holder for axially, or rotational movements or arrangement s.

This is WHAT THE JUDGES MEANT TO ENDORSE.

A connector or interconnectors have audiovisual and equipment, or a software and hardware.

#### COMMON TOOLS WITH THE DEFENDANT PRODUCT

1. Wire or cable with metal tip, a slide cork and cork screwdriver, or grove lining or
2. Remote or wireless

3. Camera socket, ports, ports with metal tip, a slide cork and cork screwdriver, or grove lining
4. Screws
5. Brackets
6. Screw driver
7. Base
8. Resilient clip, comprises of, Screws, screw driver, cork screw, cork screwdriver grove lining, grove lining handle.
9. Clasp: comprises of base, or clip body, brackets, resilient clip

**Adjustable:** is those devices that can be mounted or configured, modified, adapted according to the specifications of the owner or user.

#### **RELEVANT TO THE SCOPE OF THE INVENTION**

See page 1, paragraph 6, line 3, US 840. Description of related art, It state "thus there is a need for an improved book holder that is quickly and easily clipped (tool) in mobile vehicle such as a wheelchair or stroller that for holding the book in a reading position in space relation to the clip.

While the defendant recognize the 1st objective of the summer of the patent, page 1, paragraph 7 of the objective of US 840, It state, It is another object of the present invention to provide a book holder that can be easily and removably attached to and removed from a bar or portion of the mobile vehicle without tools: for a example see above, common tools with the defendant is a cable.....is it not obvious in the light of prior art.

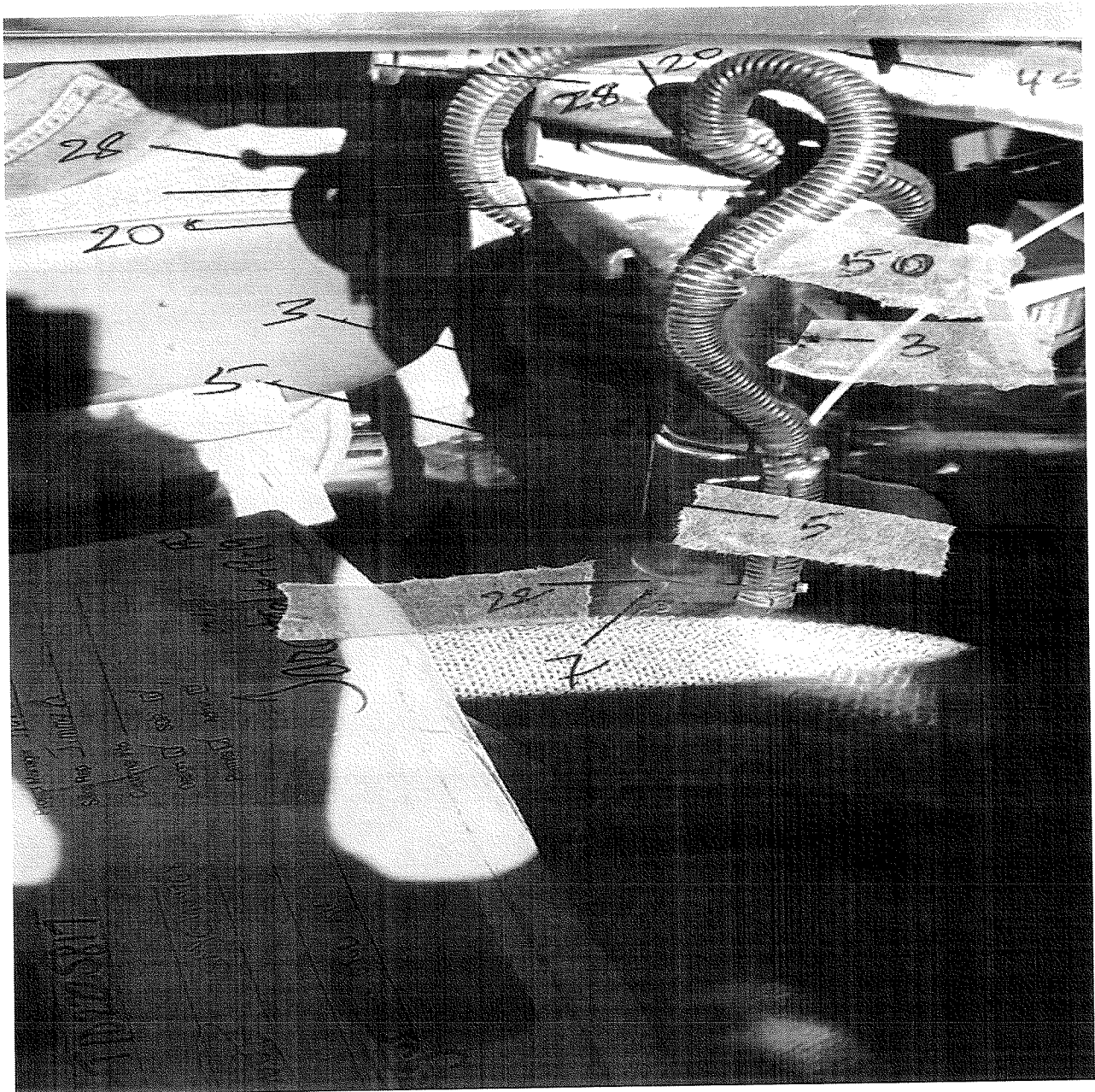
#### **THE ACTUAL STATEMENT**

the applicant submit that the invention is not anticipated by the prior art, further the use of Adjustable , resilient clip arm on the clasp to Clasp book holder on a movable vehicle providing quick removal and attachment without tools axial adjustable for adjusting the space relation between the clasp and the book support, rotational adjustment on the arm between the arm and the book support, pivotal adjustment between the arm and the book support for is not obvious in the light of prior art.

Relevant to this case, see US patent 840, the summary of invention, it States that it is another object of the present invention to provide a clasp comprising a clip having an adjustable resilient arm for removably attached to a mounting structure on a mobile vehicle.

Your Hon. I plead with the court not to restrict this objective of the invention, please see page 2, paragraph 1, It state, It is an object of the present invention to provide an adjustable clasp for attaching the book holder to the mobile vehicle to easily and quickly attach or detach the book holder.

Your Hon, I plead with the court not to restrict the modification, adjustability, adaptable, selective fixing of the portion of the book holder, vehicle and others. It is another object of the present invention to provide a connector means, for removably securing a book to the book holder in a reading position. Example of connector cables or screwdriver are software for electronics and hardware for electronics and book holder.



UNITED STATES DISTRICT COURT FOR THE  
SOUTHERN DISTRICT OF NEW YORK

CHIKEZIE OTTAH

Case

Plaintiff

V

NATIONAL GRID

Defendant

**The patent US Patent 840 was granted on the day of Dec.26 2006, the patent merited 37 C F R 1.57, 37 C F R 1.75 (1), 35 USC 154(d), and 35 USC 252, and a claim technology.((incorporation by reference (12 Fig. 1, page 2, paragraph 1, line 1 to 10) and directly infringement of the claim.**

**Using the inter-conjunctive words to sort the meaning and definition of the claim, the claimed words and words in specification indicate that on the reference, the use of conjunction word (Adjustable) before resilient clip, The applicant submits that the invention is not anticipate by the prior arts, further the use of adjustable , resilient clip arm on the clasp for clasping the book holder on a movable vehicle provide quick removal and attachment without tools, axial adjustment for adjusting the space between the clasp and the book support, rotational adjustment on the arm**



between the clasp and the book support, pivotal adjustments between the arm and the book support for is not obvious in the light of prior art.

Show there is other tools or methods included, on the same day July 25, I stated to the examiner that a claimed audio video and equipment has been add to the specification, see US Appl.10/366,779, page 12/13, column 33/34. It is undisputed facts no prior art mention a cable or audio video equipment anywhere, it is obvious in the light of the prior art, the limitation of electronic tooling.

I learned, and respectfully state that the district courts ruling in the case number 10 cv. 7296 from USDC, and Appeal case number 12-1405 USCA Fed. Circuit was contradictory to the above mention laws.

The ruling from district USDC on the case 10 cv. 7296 estoppel, which relied on US Patent 4/201,013 by Wierma was contradictory to US 840 Patent scope that include tools, (soft and hard wares) technology and mobility.

The finding of estoppels and Appeals court in the case number 12-1405 construction of the scope of the claim without the claim section of audio equipment, which include audio video and equipment like planar panel, or TV, monitor, screen, computer, cell phone, Camera, blue tooth, out lets, writing board, black board, white board, ELECTRIC BOARD, soft ware and hardware like base, screw, screw driver, clip, resilient arm, clip arm,

clamps, bolt, brackets, or USB Cable, adapters, mouse, remote control, and Ethernet adapters or amplifiers, speakers, etc. was wrongful

I learned and respectfully state that the ruling from the lower courts like case number 1.15 cv.02465 LTS, and 11-cv. 06187 contradict US 840 in technology and tools also citing or relying on US patent 4/201,013 was wrongful. The court claim construction eliminates claim section for technology, please see claim section, Page 6, paragraph 3, line 1 to the end, the claimed connector/interconnection is claim of the technology and it have change the scope of the book holder.

#### **THE MEANING OF CONNECTOR AND OR INTERCONNECTOR**

“An interconnector is a network system that allows you to become connected to a televised program through a wire, wireless telephone, television, computer, camera, audio video printer, or copier Services”

This has stated a plausible claim

On Chikezie Ottah V. National Grid, 19 Civ. 08289 (PAE)(RWL) I respectfully thank the court for acting on claim construction I submitted, the court finally recognized the technology and it claimed elements in the claim, example the connector or and interconnector, it is a sophisticated language to claim huge amount of electronics, there soft ware and hardware in a simply one name. I respectfully state that the electronic or technology and other items were writing all over the specification, please see Fig. 1, paragraph 1, page 2, line 5 to 8, US Patent 840, another example

where technology and electronic was individual mention was on Fig. 8, paragraph 3, page 5, line 2 to 4 US Patent 840, anothers.

I respectfully thank the court for understanding that those electronics, or technologies, and the items are collectively interconnectors or connectors, the book holder is built on the demand of the user, example an interconnector or connector have a laptop or camera, the soft ware and hard ware ( example electric cable or screws) to mount the camera on a mobile vehicle, please see the summary of invention, page 2, paragraph 6, 7, 8, 9. They are relevant to this case. I regret the court passed a good opportunity for a guilty verdict against National Grid, my claim construction was good enough for a guilt verdict, because the claim was plausible.

Chikezie Ottah V. Verizon, case number 19 Civ. 8552 (LT) I respectfully thank the court for acting on claim construction I submitted, the court finally recognized the technology and it claimed elements in the claim, example the connector or and interconnector, it is a sophisticated language to claim huge amount of electronics and there soft ware and hardware in a simply one name, example an interconnector or connector ( Plausible) have a laptop or camera, the soft ware and hard ware ( example electric cable or screws) to mount the camera on a mobile vehicle with book holder, removably attach, please see the summary of invention, page

2, paragraph 6, 7, 8, 9. They are relevant to this case. I regret the court passed a good opportunity for a guilty verdict against Verizon, my claim construction and summary Judgment was good enough for a guilt verdict, because the claim was plausible.

## **PLAUSIBLE CLAIM OF THE WORD INTERCONNECTOR (CONNECTOR).**

This is what the above court knew in the definition and meaning of the word interconnector from dictionary:

 86% 9:43 PM  
two or more things

[+] Example sentences

**2** [noncount] : the act of connecting two or more things or the state of being connected

[+] Example sentences

**3** [count]

**a** : a situation in which two or more things have the same cause, origin, goal, etc.

[+] Example sentences


**b** : a situation in which one thing causes another

[+] Example sentences

**4** [count]

**a** : something that allows you to become connected to a system, network, etc., through a telephone, computer, or other device

[+] Example sentences

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2 *Radio and Television.*

- a a group of transmitting stations linked by wire or microwave relay so that the same program can be broadcast or telecast by all.
- b a company or organization that provides programs to be broadcast over these stations:

*She was hired by the network as program coordinator.*

3 *Telecommunications, Computers.*

a system containing any combination of computers, computer terminals, printers, audio or visual devices, or telephones interconnected by

**The Only  
Gift  
Parents  
Need Is  
Here**

The court knew the claimed interconnector or connector word when sort out meanings computer, audio or visual, telephone, camera, printer, E book and other devices. Just like mention in the specification, for example see US Patent 840, Fig. 8, page 5, paragraph 3.

Further from the mention in the specification on Fig. 8, page 5, paragraph 3, where the electronic elements and equipment are not functional, but

inside the claim, the technology mention above are network bound and functional, modifiable or adjustably removably attached to mounted on a book holder, telescopic arrangement axially adjusting to reading position, adjusting the space relation between the book support platform and the bracket, that is plausible.

**ESTOPPLE:**

It is other object of the present invention to provide a clasp comprising a clip having an ADJUSTABLE resilient arm for removably attaching to a mounting structure on the mobile vehicle. This is relevant to the stopple case, to the honorable Judge, and to the post case 11 cv. 06187.

Case number 1.15 cv.02465 LTS, and 11-cv. 06187

Please Honorable, this cases was found not infringed due to the defendants misguided interpretation of estoppel, Your honor here is the tool at the center of the misinterpretation RESILIENT CLIP ARM, and here is the meaning: “An adaptable tool that combines a screwdriver, a corkscrew and a pillar” please see the conjunction word “Adjustable” above, see the claim, Page 6, paragraph 2,” A clasp comprising, a clip head, a clip body, and a pair of resilient clip arm, the clip arm adjustable mount on the clip head and clip head attached on the clip body” this is an





Cambridge Dictionary

Meaning of **adjustable** in English

**adjustable**

*adjective*

US  /ə'dʒʌs.tə.bəl/ UK  /ə'dʒʌs.tə.bəl/

+ ≡

**able to be changed to suit particular needs:**

- *The height of the steering wheel is adjustable.*
- *Is the strap on this helmet adjustable?*

— **SMART Vocabulary: related words and phrases**

Adapting and modifying

acclimate

acclimatization

No prior art made of record have same configuration mention inside the claim or in the specification of US 840, the defendant is welcome to present the prior art that form the base for estoppel.

FOOT NOTE; CAMBRIDGE DICTIONARY

instead of the 3 elements know to the courts when the 1<sup>st</sup> claim construction was made, the elements are 5 now.

I learned and respectfully state that the ruling of the lower courts on standard review or De novo standard relying on incomplete claim construction is unfair and unjust, I believe that the court (Supreme court) do not leave unfair, unjust, and unlawful art, or otherwise the best persuasive argument that ham the people to under mind the justice and the rule of law. I believe the court or the Judges have the power and the knowledge to deliver Justice.

FRCP 15(d) this is a fact, where justice is concern the court have overruled its prior decisions, like the Supreme court in Tevo Pharm. USA V. Sandoz inc. the ruling on claim scope is a matter of claim construction which is a question of law. See United States Court of Appeals, case number 17/2369.

FOREST LABS. LLC V. SIGMAPHARM, ,17.2369

*Federal Circuit Summary*

Before Prost, Dyk, and Moore. Appeal from District of Delaware.

Your Hon. I respectfully submit my claims for Patent US 840. The same is attached in the compliant.

THE CONJUNCTIVE WORD "AJUSTABLE".

The actual language during the prosecution, the defendant added during the prosecution I argued that "the use of Adjustable resilient clip on the clasp for clasping the book holder to the movable vehicle providing quick removal and attachment without tools..... is not obvious in the light of the prior art" the word adjustable resilient clip introduce facts about the resilient clip is not only used in one way, but multiple ways, a resilient clip comprising a screw, a screw



driver, cork screw, cork screw driver. Base, brackets, ridge groove, ridge groove screw and or screw driver, cork USB, USB cork port or ports, cable with copper tips ( Concentric interconnector Fig,3 page 3, paragraph 1, line 6 US Patent 840)

Your Hon. During the same prosecution, I also informed the examiner that the previously claimed technologies and equipment, like a cable have be added to the specification, ( see Fig. 8, page 5, paragraph 3 US Patent 840)( see the publication US 10/366/779 , publication date 2/19/2003) ( see Ottah V. Flat Chrysler, 884 F. 3d 1135, United States court of Appeals, Federal Circuit. Id.at col.6, 11.14-38, and Id.at col.5, 11.35-40).

#### AFTER THE FACTS:

Your Hon. It is a fact the prior art do not assemble electrical cable, or a concentric connection or "adaptable" interconnection of any type. It is obvious in the light of the prior art. Without any explanations quick removal and attachment without tools..... is not obvious in the light of the prior art" the word adjustable resilient clip introduce facts about the resilient, the defendant effort to restrict the use of tools for US Patent 840 is after the fact, the adjustability function of US Patent 840 allow the assembling of the fixed with drill, or tools that allow combination of other tools.

#### CLAIMED ELEMENTS OF US 840;

1. A book support platform, the book support platform comprising a front surface, a rear surface and a plurality of clamps, the front surface adapted for supporting a book, the plurality of clamps disposed on the front surface to engage and retain the book to the book support platform, the rear surface separated from the front surface:
2. A clasp comprising a clip head, a clip body, a pair of resilient arms, the clip arms adjustably mounted on the clip head and attach to the clip body, and
- 3. An arm comprising a first end and a second end and a telescoping arrangement, the clasp on the first end, the second end pivotally attached to the book support platform, the telescoping arrangement interconnecting the first end tob the second end, the clasp space from the**

book support platform, wherein the book holder is removably attached and adjusted to a reading position by the telescoping arrangement axially adjusting the space relation between the book support platform and the clasp and the pivotal connection on the book support platform pivotally adjusting the front surface with respect to the arm.

4. Audio equipment, include planar panel, TV, monitor, camera, computer, lap top, cell phone, hard ware and soft ware, audio video.

5. book, E-book, blue tooth, and hard ware and soft ware

The last 2 elements was incorporated (37 C F R 1.57) from an original claims disclosed on 2/19/2003 page 2, also disclosed again on 4/24/2004, page 13, the publication was in US Patent application number 10/366/779. See the attached appendix pages 22 and 32. 35 USC 154 (d). See US 840 page 6, paragraph 1, line 1 to 11.

### **3<sup>rd</sup> ELEMENT: THE ARM IS OPTIONAL**

Your Hon. I respectfully incorporate this claims to be legally granted by law, please see the attached memorandum pages 10 to 16. Honorable learned Justice, please see Patent US 840, Fig.8, Page 5, paragraph 3. See Fig.1, page 2, line 5 to 8, the specification have the technologies, it is identical with the claim. Good thing is the technologies can be assembled in their own tools. See the incorporated claim 4, 4. Audio equipment,

include planar panel, TV, monitor, CAMERA, computer, lap top, cell phone, hard ware and soft ware, audio video equipment.

The tools or equipment may need a minor modification of tools or hard ware or soft ware (soft ware are tools) to assemble the camera (Camera, monitor, screen, planar panel) in a GM cars from Toyota, ford, etc. Your Hon. see page 6, paragraph 1, US 840 suggested converting or assembling parts into a functioning unity, see the specification on Fig. 1, paragraph 1, line 6 to 8, it state that the platform may be “configure” to be suitable for book, writing board, white board, drawing board and ELECTRONIC BOARD. See the claim section, US 840 page 6, in element 1, line 3, the front surface “adapted” for support book, or herein camera. Your Hon. the law, the specification and the claim are identical in making, modifying, and assembling the named items or camera, see Fig. 8, paragraph 3, Your Hon. it is substantially the same in a appeals court review with the defendant vehicle camera.

This is the claim as exactly or origination written, Date 2/19/2003, and publication number is 10/366/799. A second publication dated on 4/24/2003. I Chineye Ottah and Kon Woryz Corporation are claiming priority with noon-start as a head start product and a book holder targeted to structures use mostly by children.

“Noon-start is the first head start product on children strollers, carriage, bed, chairs, and on the floor that help mold the kids reading, writing, singing, and playing habits.

The product give the kids advantages in learning because noon- start can be use by kids in any environment, at the bus stop. Train, at the park, at the beach, restaurant, at school, and at hoom. Reading writing, singing, and playing with book and or AUDIO EQUIPMENTS.

Noon-start is a book holder” the mobile AUDIO EQUIPMENTS is plausible claim of defendants liability, the earlier ruling of non infringement in case number 1.15 cv.02465. LTS should be over turn. I plead Your Hon.

Reinstate the following cases from USDC for the same infringement case number 11-cv.06187, and 10 cv.7296CM

#### PLAUSIBLE CLAIM OF TECHNOLOGY:

Claims are the bed rock of an invention

The claim of a patent determines the scope of the invention.

#### BACKGROUND

With all due respect to the court, I have to state that the defendants have intentionally mean to miss lead the court, the case number 10 cv. 7287 the defendant miss represented the patent, especially the tool called resilient arm, and yet all Of the defendant are using it in their products. According to US patent 840, the resilient clip is a tool made to retract and extract to allow telescopic arrangements and modification, examples removal and attach from the axial joints, the arm adjustable like screwdriver is use to contract the clip through an adjustable clasp or clip body a base to lock the position of the book holder in a resilient fixed and the arm again is used in anti clock turn to retract the positions

of the book holder. See page 2, paragraph 6, of the summary of invention, Us patent. it state, It is another object of present invention to provide a clasp comprising a clip having an adjustable resilient arm for removably attached to a mounting structure on the mobile vehicle. This is relevant.

### CONSTRUCTION OF CLAIM

The court claims construction eliminated the claim section that represents the technology to the delight of the defendants. For example see id at1164 38, . As a Pro Se I believe in the laws of United of America. I trust the court to construct the claim fair and just but the court was miss lead to overlook the definition and meaning of the Words that would have include technology and tools into the scope of the claim. See claim section, Page 6, paragraph 3, line 1-9, connector/interconnector.

### THOSE REGULATIONS ARE ANTIDOTES

The point is the 1st court ignored the antidote ( CFR. 1.75, and CFR 1.58) in the specifications and draws and could not understand the meaning and definition of the same word interconnector or and connector at the claim.

Contrary Hon. Judge McMahon, in case number 10 Civ. 7296, see id at1164 38, she believe that the claim section did not contain claim of technology and it result turned into De novo doctrine against 3 of my earlier case in SDNY. In her decision, Judge McMahon, I quoted the alternative with a reference to the interconnectors or electronic , but in the court decision, the court said the interconnector or the electronic board was not in the claim, please see Fig. 3, page 3, paragraph 1, line 1 to 5. and see summary of the invention, page 2, paragraph 8, US Patent 840. And see the summary of invention page 2, paragraph 9, US Patent 840. The electronic was reference interconnectors ,or connectors.



It took me three court ruling and two appeals to turn the unfavorable rulings, that force me into separately start my own claim construct and arrived at undisputed claim construct and we got the technology. Now the court has recognized and allowed me to add connector and interconnector in the claim elements and the scope include electronics and technologies. See Hon. Judge Lehrburger case number 19 Cv. 08289 PAE/RWL, caption Chikezie Ottah Nation Grid,

The applicant submits that the invention is not anticipate by the prior arts, further the use of adjustable , resilient clip arm on the clasp for clasping the book holder on a movable vehicle provide quick removal and attachment without tools, axial adjustment for adjusting the space between the clasp and the book support, rotational adjustment on the arm between the clasp and the book support, pivotal adjustments between the arm and the book support for is not obvious in the light of prior art.

As described above, the resilient

clip has an arm, the arm is adjustable attached to it for contracting and retracting telescoping of the book holder. Example and relevant to the case, see the summary of invention US Patent number 840, page 2, paragraph 6,, it state, it is another object of the present invention to provide a clasp comprising a clip having an adjustable resilient arm for removably attached to a mounting structure on a mobile vehicle.

Now here is the relevant claim section, another modification, Claim 1, page 6, paragraph 3, line 5, Where in book holder is removably attached and adjusted to a reading position by telescopic arrangements axially adjusting the space relation between book support platform and clasp and the pivotal connection on the support platform pivotally adjusting the front surface with respect to the arm. This means that book holder can be removable and attached electronic or elements. In modification the word adjustable is powerful, for example it means change of elements, or rotational of the already fixed element or electronic, please see the attached dictionary mean, it is a fact plausible claim for a relief.

Here in the claim section above, the word ADJUSTABLE and A CONNECTOR in modification is straightforward, the connector or interconnectors provide the scope for both book and computer changes, attached to the front platform, the connector or interconnectors provide the computer to adjustably remove the book and attach the computer, this is a fact and a plausible configuration, see Fig. 3, page 3, paragraph 1. Line 1 to 7, with reference to (12, Fig. 1).

See Fig.1 illustrated a book holder assembly 10 according to the 1st embodiment of present invention. The book holder 10 comprise a book platform 12 and an adjustable arm 14 and a 15 clasp. The book platform 12 includes a generally planar panel 16 ( 12 general planar panel, include computer, camera, radio, television, telephone, cellphone, video and audio) having a front 18 and a rear surface 20. The front surface 18 is configured to hold a book or suitable for use as a writing, drawing, white, black, electronic board, computer, laptop, camera, telephone, cellphone, phone, television audio video equipment. The rear surface of 20 book platform 12 is attach to the adjustable support arm 14 at an angle suitable for reading. See the meaning of the adaptable, connector or interconnector above, the meaning of those words read the same meaning in the specification.

The specification describes the claimed book holder and its removable and attachment, relevant to this suit, the specification ended, just below to the claim, state that the book holder may be used to hold this items other than the books: the platform 12 may also be used to support such items as audio video and equipment, PDAs, Mobile phone, camera, computers, musical instruments, toys, puzzle, games, the panel 16 may be provided with a set of mounting positions for receiving and or mounting the above items.

INTERCONNECTOR OR CONNECTOR IS PLAUSIBLE ELECTRONIC OR TECHNOLOGIES.

Determining of patent infringement requires two steps, the 1st step is determining the meaning and scope of the patent claim to the asserted to be infringed, the 2nd step is comparing the properly constructed claim to the device

accused of infringing. *Marksman v. Westview instructment, inc* 52. F 3d 967, 976 (Fed. Cir. 1995).

‘An interconnector is a network system that allows you to become connected to a televised program through a wire, wireless telephone, television, computer, camera, audio video printer, or copier Services .’

## THE ACCUSED PRODUCT

The accused product is a computer or book holder.

A platform, front surface telescopic arrangements, a computer slide into the platform

1 platform.

2. A brackets

3 resilient arm

4 upper arm

5. Resilient arm

6 middle arm

7 Resllient arm

8 lower arm

9. Lower bracket

10 attach to the dash board

THE CLAIM; UNDISPUTED BY THE DEFENDANT  
THE CLAIM IS THE BED-ROCK OF PATENT, WITH CLARITY.

**Platform**

1. Platform front surface maybe adopted, or modified, configured to hold books or technology (Eg. White board, black board, ELECTRONIC BOARD)

Platform maybe clamped, locked, or use other tools, connector, bracket,

2. clasp, ( maybe modified) to base, connectors. Or brackets

Clip head – maybe modified, holes, bolt, screw, clip, Base, to hold another element

1<sup>st</sup> and 2<sup>nd</sup> arm (maybe modified) to mount vertical or horizontal

Clip - maybe clip body to attach, element to attach to another

clip arm - clamping brackets, slidable connectors and others

Clip arm – element that require tools to attach/ hold to another elements to mount - multi- sides I shape brackets or connector, or base

3. Arms (no dispute) stable pole (example elongated arm) attach to the vehicle floor and holding the platform in a readable positions. Adaptable to elements.

Interconnector; soft ware or hardware, like audio video equipment, amplifier, mouse, swivel, input or output devices and there hard shell, mother board, CPU, memory, processor, power and power line cable, fan, IP, LAN, computer, camera, phone, printer

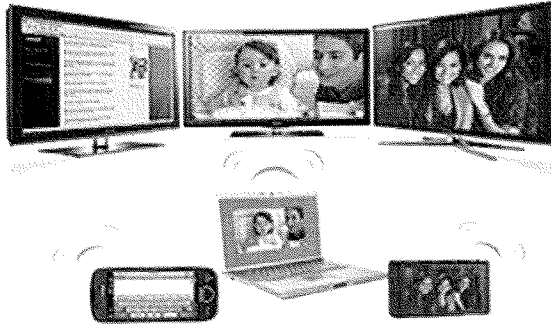
Pivot attachment - inter-connector eg software or hardware, like audio video, or tile, V,L,O, C, Z connectors, screws, rivet, swivel, multi. Side bracket, single or multi. Hole brakets etc.

Pivotal attachment to the platform - interconnector, eg. audio video equipment

Software and or hardware, like LAPTOP, screw, connectors, brackets, nuts, bolts, rivet, base, power cables, mause, USB cords, IP address etc.

Pair of resilient - concentric mount equipment, nut, rivet, bolt, etc

Pivotal adjustment - the interconnector are software and or hardware that allow movement



## **CONNECTOR AND INTERCONNECTOR**

**INTERCONNECTOR OR CONNECTOR IS PLAUSIBLE ELECTRONIC OR TECHNOLOGIES.**

Determining of patent infringement requires two steps, the 1st step is determining the meaning and scope of the patent claim to the asserted to be infringed, the 2nd step is comparing the properly constructed claim to the device accused of infringed. *Marksman v. Westview instrument, inc.* 52. F 3d 967, 976 (Fed. Cir. 1995).

‘An interconnector is a network system that allows you to become connected to a televised program through a wired, wireless telephone, television, computer, camera, audio video printer, or copier Services.’

## **THE LAPTOP HOLDER CONSTRUCTION OF ELEMENT**

**ATTACHED IS THE ACCUSED BOOK/LAPTOP HOLDER PARTS FOUND IN VERIZON VEHICLE.**

- 1. (20) PLATFORM (DESIGNED FOR LAPTOP)**
- 2. (22) CLIP/clip body**



3. (28) ADJUSTABLE ARM
4. (03)UPPER ARM
5. (05) lower arm
6. (08) Clip arm
7. (7) base
8. (22) 22 screw hold
9. (45) lop top
- 10.(50) wire

This elements are consistent with elements in US Patent 7,152,840. See exhibit 1.

ATTACH IS A SLIGHTLY ADAPTABLE OR MODIFIED BOOK /LAPTOP FOUND IN DEFENDANT VEHICLES.

1. THIS IS ELEMENTS AND EQUIVALENTS AS FOUND IN US PATENT 7,152,840
2. 3. Upper Arm. 5. lower arm
3. 7 Base
4. 20 Platform
5. 22 Clip /Clip body
6. 28 Adjustable handle /arm /lock
7. 41 Pivotal connector ( if applicable 45. Lab top. 50 mobile lab top equipment)
8. THIS IS ELEMENTTS AND EQUIVALENTS AS FOUND IN VERIZON PRODUCT
9. 3. Upper arm. 5. lower An arm
10. 7 Base
11. 20 Platform
12. 28 Adjustable handle/lock / resilient arm
- 7
- 13.22 Clip /Clip body
- 14.28 Adjustable handle /arm /lock
- 41 Pivotal connectors

## **BRIEF DESCRIPTION OF THE DRAWING**

A description of the infringement illustrated using words from Fig.4.

Fig. 4. See the publication in US Patent Appl. Number 10/366,779, date July 25 2005, page 33 to 38, paragraph 2.

[0020] Fig. 4. Is a side perspective view of the book holder of Fig. 1 illustrating an alternate clip arrangement; this are the claimed embodiment in Fig.4

Illustrating a 20 book or 45 audio video equipment support, and support 3 arm. The support arm comprise a 7 base, a lower section 5 and upper section 3, the lower 5 arm comprise of 7 and 22 holes is removable by 7 screw means; 7 screw thread 7 base to a vertical or horizontal object(a pole) on the mobile vehicle/ the 5 arm 28 connector rotatable or slidably attach to the lower of the 5 supporting arm to the upper 3 section. The upper 3 arm section has pivotal 41 connectors or 50 inter connectors. The base was modified from the shown clip body in Fig. 5, please see the exhibit 1 and 2, and the claim for the definition of a clip body,

## **Legal**

The design product from US patent 7,152,840, is identical to defendant product seen in exhibit 1, all the, design, elements or equivalent are the same.

The design product from US Patent 7,152,840 and defendant product seen in exhibit 2, all the elements or equivalent are the same, and function the same way, production the same, the description above said it all. The plead is justified according to Fed.Civ.P. 8(a)(2) it is a fact any jury will convent the defendant.

The defendant products in exhibit 1 and exhibit 2 already exist, see US Patent 7,152, 840. Even if US Patent 629 is presented for the defendant protection, US Patent 629 is late and not effective.

°This is what the Hon. Judge meant during

the court review and construction of 840 claim citing Verifone, 524 F. Apply. at 629 base on claim 1, required that "the book holder is removably attached, the defendant added during the prosecution I argued that "the use of Adjustable resilient clip on the clasp for clasping the book holder to the movable vehicle providing quick removal and attachment without tools..... is not obvious in the light of the prior art"

**THE DEFENDANT MISSLEAD THE COURT ON TOOLING AND CLIP (Alternative Clip is screw or screw driver see, Fig. 4, paragraph 1, page 4, line 12-14)**

Please see, Brief description of 840 Patent Drawing, Fig. 4, Page 2, paragraph 4, it States: Alternative clip or tool arrangement. Your Hon. Clip is simply tools, example a resilient clip means a resilient tools, please see the explanation below. The defendant is been restrictive.

**FIGURE 4, PAGE 2, PARAGRAPH 4, 37 CFR 1.75**

It referenced and incorporated Fig.1, (12), 37 CFR 1.57. Incorporate by reference the configuration of 12 book platform, example of the book platform are writing, drawing board, white board, black board, ELECTRONIC BOARD.

ELECTEONIC BOARD, Comprises; audiovisual, Computer, laptop, Camera, Radio, Fax, printer, Cellphone, phone.

Although the invention has been described above in connection with particular embodiment and examples, it will be appreciated by those skilled in the art that the invention is not necessarily so limited and that numerous other embodiments, example and uses are intended to be encompassed by the claims attached hereto.

#### **TECHNOLOGY CONTEXT IN US PATENT 840**

The specification describes the claimed book holder and its removable attachment. Relevant to this suit, the specification concludes with the statement that the book holder may be used to hold items other than books "the book platform 12 may also be used to support such items as audio video equipment, PASSENGER, or mobile phones, Camera, computers, musical instruments, toys, puzzles and games. The panel 16 may be provided with a set of mounting positions for receiving and /or mounting the above item( not shown Id. at col, 5,11, . 35 40,) and see Fig.8, page 5, paragraph 3,

More content relevant to the suit, see the summary of the invention, page 2, paragraph 6, it state it is the object of the invention to provide a writing board, example white board, black board, ELECTRONIC BOARD comprising an audio video, mobile phone, camera, computer, laptop, Fax, copier, bar code, media exchange, internet and equipment's.

Further context, see Fig. 3, page 3, paragraph 1. It referenced and incorporated into Fig. 1, (12), 37 CFR 1.57. Incorporate by reference the configuration of 12 book platform, example of adaptable book platform are writing, drawing board, white board, black board, ELECTRONIC BOARD.

ELECTRONIC BOARD, Comprises; audiovisual, Computer, laptop, Camera, Radio, Fax, printer, Cellphone, phone.

IT IS PLAUSIBLE THE CLAIM OF THE TECHNOLOGY. While the ordinary meaning of claim language as understood by a person of skill in the art may readily apparent even to a lay Judge, claim construction in such cases involves little more than the application of widely accepted meaning of the commonly understood words. The uses of technology have been well documented

see the claim section, page 6, paragraph 1

and an adjustable arm 14 and 15 a clasp

#### ADJUSTABLE

Arm (IF NECESSARY ADD OR REDUCE ARM)

And clasp (ALL THE ABOVE TOOLS AND ELEMENTS)

Please see, Fig. 8, page 5, paragraph 3, line 1-6.

Your Hon. See the bottom text on Fig. 4, paragraph 1, page 4, line 12-14. It states that the position of the clip arms 74a74 along the clip body 78 can be selectively fixed by a screw. Example a base may be embed by a screw, and the joint between two arms is joined by resilient clip, to allow positioning of the book holder for axially, or rotational movements or arrangement s.

This is WHAT THE JUDGES MEANT TO ENDORSE.

A connector or interconnectors have audiovisual and equipment, or a software and hardware.

#### COMMON TOOLS WITH THE DEFENDANT PRODUCT

1. Wire or cable with metal tip, a slide cork and cork screwdriver, or grove lining or
2. Remote or wireless

3. Camera socket, ports, ports with metal tip, a slide cork and cork screwdriver, or grove lining
4. Screws
5. Brackets
6. Screw driver
7. Base
8. Resilient clip, comprises of, Screws, screw driver, cork screw, cork screwdriver grove lining, grove lining handle.
9. Clasp: comprises of base, or clip body, brackets, resilient clip

**Adjustable:** is those devices that can be mounted or configured, modified, adapted according to the specifications of the owner or user.

#### **RELEVANT TO THE SCOPE OF THE INVENTION**

See page 1, paragraph 6, line 3, US 840. Description of related art, It state "thus there is a need for an improved book holder that is quickly and easily clipped (tool) in mobile vehicle such as a wheelchair or stroller that for holding the book in a reading position in space relation to the clip.

While the defendant recognize the 1st objective of the summer of the patent, page 1, paragraph 7 of the objective of US 840, It state, It is another object of the present invention to provide a book holder that can be easily and removably attached to and removed from a bar or portion of the mobile vehicle without tools: for a example see above, common tools with the defendant is a cable.....is it not obvious in the light of prior art.

#### **THE ACTUAL STATEMENT**

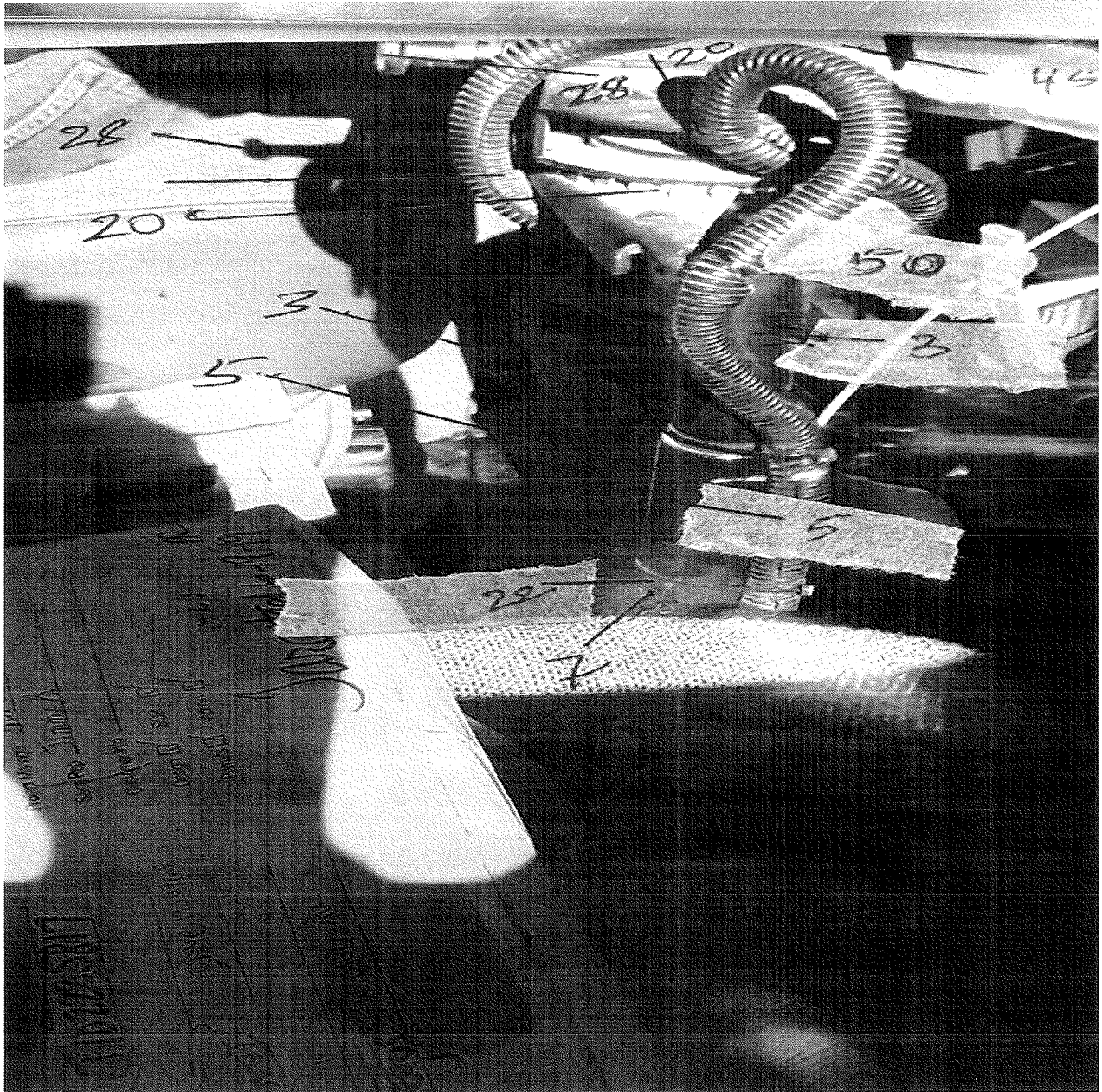
the applicant submit that the invention is not anticipated by the prior art, further the use of Adjustable , resilient clip arm on the clasp to Clasp book holder on a movable vehicle providing quick removal and attachment without tools axial adjustable for adjusting the space relation between the clasp and the book support, rotational adjustment on the arm between the arm and the book support, pivotal adjustment between the arm and the book support for is not obvious in the light of prior art.

Relevant to this case, see US patent 840, the summary of invention, it States that it is another object of the present invention to provide a clasp comprising a clip having an adjustable resilient arm for removably attached to a mounting structure on a mobile vehicle.



**Your Hon. I plead with the court not to restrict this objective of the invention, please see page 2, paragraph 1, It state, It is an object of the present invention to provide an adjustable clasp for attaching the book holder to the mobile vehicle to easily and quickly attach or detach the book holder.**

**Your Hon, I plead with the court not to restrict the modification, adjustability, adaptable, selective fixing of the portion of the book holder, vehicle and others. It is another object of the present invention to provide a connector means, for removably securing a book to the book holder in a reading position. Example of connector cables or screwdriver are software for electronics and hardware for electronics and book holder.**



**United States District Court Of New York**

**Southern District Of NY NY 10007**

**Pearl Street Manhattan, NY NY**

**Chikezie Ottah**

**v.**

**National Grid**

**TABLE OF AUTHORITY**

**UNITED STATES CONSTITUTION**

**US PATENT 7,152,830**

**US PATENT SERIAL NUMBER 10/366/779**

**UNITED STATES DISTRICT COURT RECORD, NEW YORK**

**SOUTHERN NEW YORK**

**DICTIONARY ( foot notes)**